
**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,)
Plaintiff,)
)
v.) Civil Action No.
) 2:19-cv-767-ECM-SMD
)
DYNAMIC SECURITY, INC.,)
Defendant.)

**DECLARATION OF HEATHER LEONARD IN SUPPORT OF THE
PLAINTIFF'S MOTION FOR AN AWARD OF ATTORNEY'S FEES AND
EXPENSES**

I, Heather Leonard, pursuant to 28 U.S.C. 1746, hereby declare and affirm that I am over 18 and am competent to make the following Declaration:

1. My name is Heather Leonard. I am an attorney and mediator with an office in Birmingham, but I practice throughout the State of Alabama. I make this declaration based on my personal knowledge and experience.

Leonard's Qualifications and Familiarity with Employment Law

2. I graduated from the University of Alabama School of Law in 1998 and was admitted to the Alabama State Bar that same year. While in law school, I was a member of

the John A. Campbell Moot Court Board and the National Moot Court Team. I was the Managing Editor for the *Law and Psychology Review* and served as the secretary for the Student Bar Association.

3. I practice before the United States District Court for the Northern District of Alabama, United States District Court for the Middle District of Alabama, United States District Court for the Southern District of Alabama, and the United States Court of Appeals for the Eleventh Circuit. I also serve as a mediator and arbitrator.

4. Since 1998, I have focused my practice of law on the area of employment and civil rights litigation. I currently represent both Plaintiffs and Defendants in employment related cases. I have tried jury trial cases in the United States District Courts in Alabama since 1998 and have argued appellate cases before the United States Court of Appeals for the Eleventh Circuit.

5. I served on the Board of the Alabama State Bar's Labor and Employment Section from 2017-2023. In 2023, I was the Chair for the Alabama State Bar's Labor and Employment Section. I am also the former president of the Alabama affiliate for the National Employment Lawyers Association ("NELA").

6. I have written the following articles relating to employment law:

a. *The Family and Medical Leave Act - Does it Apply to Job Applicants;*
Birmingham Bar Association Bulletin, Winter 2000

- b. *Military Leave: and Employer's Basic Obligations*; Birmingham Bar Association Bulletin, Spring 2003
- c. *Proceed with Caution: Hiring of Legal Support Staff — An Analysis of Opinion of the General Counsel, Opinion No. 02-01*; Birmingham Bar Association Bulletin, Fall 2002
- d. *Can An Employer Be Held Liable Under The Federal Anti-Discrimination Laws For Failure To Provide Health Insurance Coverage For Assisted Reproductive Technology?*; Birmingham Bar Association Bulletin, Fall 2001

7. In addition to serving as adjunct faculty at the University of Alabama at Birmingham in 2002 and 2003 (teaching trial advocacy, mediation, and mock trial), I serve on the planning committee for both the University of Alabama's School of Law's annual employment law CLE and the Cumberland School of Law Annual Labor and Employment CLE and have taught at the numerous legal seminars, including:

- *National Employment Lawyers Conference on Representing Federal and Public Employees (2024)*
- *University of Alabama CLE – Employment Law Update (2023)*
- *Cumberland School of Law – Annual Employment Law Update (2023)*
- *Alabama State Bar's Labor & Employment Section Annual Conference (2023)*

- *National Employment Lawyer's Association's Fall Conference on Summary Judgment (2023)*
- *National Employment Lawyer's Association's Annual Conference (2023)*
- *Tennessee Trial Lawyers Association's National Conference (2023)*
- *Cumberland School of Law -Annual Employment Law Update (2022)*
- *University of Alabama CLE - Employment Law Update (2021)*
- *Cumberland School of Law - Annual Employment Law Update (2023)*
- *National Employment Lawyer's Association's Trial Boot Camp (2022)*
- *Alabama State Bar's Labor & Employment Section Annual Conference (2022)*
- *National Employment Lawyer's Association's National Conference (2022)*
- *National Employment Lawyer's Association's E-Discovery & ESI for the Plaintiffs' Employment Lawyer (2022)*
- *University of Alabama CLE - Employment Law Update (2021)*
- *Cumberland School of Law-Annual Employment Law Update (2021)*
- *National Employment Law Lawyers Association — Pretrial Powerhouse: Skills for Success from ESI to Trial Day (2021)*
- *National Consumer Law Center Class Action Symposium Making ESI and Integral Part of Your Litigation Practice (2021)*
- *National Employment Lawyer's Association 's Annual Conference (2021)*

- *University of Alabama CLE-Employment Law Update (2020)*
- *Cumberland School of Law -Annual Employment Law Update (2020)*
- *Alabama State Bar Labor & Employment Section's Annual Conference (2020)*
- *National Employment Lawyer's Association's National Conference (2020)*
- *NELA-Alabama - Discovery During a Pandemic (2020)*
- *NELA-Alabama - Surviving Summary Judgment: Unlocking the Doorway to Trial (2019)*
- *National Employment Lawyer's Association 's National Conference (2019)*
- *Cumberland School of Law - Annual Employment Law Update (2018)*
- *Alabama State Bar Labor & Employment Section's Annual Conference (2018)*
- *National Employment Lawyer's Association 's National Conference (2018)*
- *Balch & Bingham's 2018 Labor & Employment Seminar (2018)*
- *National Employment Lawyer's Association's Spring Symposium - ESI & Technology for the Plaintiff's Employment Lawyer (2018)*
- *Legal Aspects of Sexual Harassment & the Psychological Aspect of Sexual Harassment & Sex Abuse (2017 hosted by the Alabama Association for Justice ALAJ)*
- *Cumberland School of Law - 24 Annual Employment Law Update (2017)*

- *Alabama State Bar Labor & Employment Section's Annual Conference* (2017)
- *National Employment Lawyer's Association Trial Bootcamp* (2017)
- *National Employment Lawyer's Association's National Conference* (2017)
- *Alabama State Bar Labor & Employment Section's Annual Conference* (2016)
- *National Employment Lawyer's Association Summary Judgment Symposium* (2016)
- *National Employment Lawyer's Association's National Conference* (2016)
- *National Employment Lawyer's Association Trial Bootcamp* (2015)
- *Cumberland School of Law - 22 Annual Employment Law Update* (2015)
- *Cumberland School of Law - 21 Annual Employment Law Update* (November 14, 2014)
- *Alabama National Employment Lawyer's Association's CLE* (January 10, 2014)
- *Cumberland School of Law - 20 Annual Employment Law Update* (December 6, 2013)
- *The Basics of Employment Law - FMLA, Title VII, ADA and FLSA -- Birmingham Bar Association* (August 9, 2013)
- *Cumberland School of Law - 19 Annual Employment Law Update* (November 16, 2012)
- *Alabama State Bar - Labor & Employment Law Section — 2012 Seminar on the Gulf-*
(October 12, 2012)
- *Cumberland School of Law - 18 Annual Employment Law Update* (December 2, 2011)

- *The Intersection of the ADAAA and FMLA* -- Birmingham Bar Association (August 19, 2011)
- *Employment Law Basics/or the Non-Employment Lawyer* Birmingham Bar Association (May 13, 2011)
- *Navigating Employment Discrimination Claims* — Birmingham Bar Association (2011)
- *Cumberland School of Law - 17 Annual Employment Law Update* (December 3, 20010)
- *University of Alabama School of Law Annual Employment Law Seminar* (December 3, 2010)
- *Cumberland School of Law - 16 Annual Employment Law Update* (December 4, 2009)
- *2009 Annual Meeting of NELA Alabama* (November 13, 2009)
- *Getting Started in Federal Court*- National Business Institute (June 9, 2009)
- *Fundamentals of Employment Law* - Sterling Education Services, Inc. (April 16, 2009)
- *Rules and Procedures for Federal Court Success* — National Business Institute (February 27, 2009)
- *Cumberland School of Law - 15th Annual Employment Law Seminar* (December 5, 2008)

- *Employment Law Update* - Sterling Education Services, Inc. (November 19, 2008)
- *The Mechanics of Alabama Civil Procedure*-National Business Institute (August 27, 2008)
- *Discovery Skills for Legal Staff*- Sterling Education Services, Inc. (April 29, 2008)
- *Employee Discharge and Documentation* - National Business Institute; Birmingham, AL (February 6, 2008)
- *Cumberland School of Law* - Annual Employment Law Update (December 7, 2007)
- *Family and Medical Leave Act in Alabama* - Lorman Education Services; Birmingham, AL (August 22, 2007)
- *Employment Law Update* - Sterling Education Services, LLC; Birmingham, AL (June 26, 2007)
- *Immigration & Employment Law Update* - Sterling Education Services, LLC; Birmingham, AL (March 27, 2007)
- *Employment Law Update* - Cumberland School of Law CLE; Birmingham, AL (December 1,2006)
- *Litigating the Plaintiffs Employment Discrimination Case in Alabama* - Lorman Education Services; Birmingham, AL (August 30, 2006)

- *Family and Medical Leave Act in Alabama* - Lorman Education Services; Birmingham, AL (April 6, 2006)
- *Fundamentals of Employment Law* - Sterling Education Services, LLC; Birmingham, AL (May 16, 2006)
- *Simple Ways to Prevent Human Resources Claims* — National Business Institute; Birmingham, AL (January 2006)
- *Practical Applications of Employment Law in Alabama* - Sterling Education Services, LLC; Birmingham, AL (February 2004)
- *Common Misconceptions in Human Resource Law* — Lorman Education Services; Birmingham, AL (May 2005)
- *Personnel Law Update* - Council (sponsored by *Constangy Brooks & Smith, LLC*), • Birmingham, AL (April 2005)
- *Fundamental Issues in Alabama Human Resources Law* -National Business Institute; Birmingham, AL (November 2004)
- *Alabama Wage and Hour Regulations and Recent Developments* - National Business Institute; Birmingham, AL (December 2004)
- *Ethics Seminar: Strategy for Success - Rules Governing Communications with a Person Represented by Counsel* - ABICLE; Tuscaloosa, AL (October 2004)
- *Legal Ethics in Alabama* - Lorman Education Services; Birmingham, AL (January 2005)

- *CLE By the Hour - The Ethical Implications of Contacting Employees of an Opposing Party*- Cumberland School of Law Continuing Legal Education; Birmingham, AL (December 2001; December 2002)
- *Internet Strategies for the Paralegal in Alabama* — National Business Institute; Birmingham, AL (February 2003)
- *Litigation Skills for Legal Staff in Alabama* - Lorman Education Services; Birmingham, AL (January 2005; April 2005; February 23, 2006)
- *Select Topics for Legal Staff in Alabama* - Lorman Education Services; Birmingham, AL (April 20, 2006)

8. I am AV rated with Martindale-Hubbell. My firm has also been ranked as a Tier One provider of employment law services by U.S. News and World Report's "Best Law Firms." I have been recognized by Super Lawyers in Labor & Employment Litigation and Employment Litigation form 2010 – 2013, and on the following lists:

- Top 50 Alabama (2011 – 2023)
- Top 50 Birmingham Super Lawyers (2020-2023)
- Top 50 Women Mid-South (2016 – 2023)
- Top 25 Women Alabama (2012-2015) (category replaced by Mid-South Women)

Reasonableness of Rates

9. Through my practice and service on the board for the National Employment Lawyers Association's Alabama affiliate, I am familiar with the hourly rates of attorneys billed and paid in the State of Alabama and in the Eleventh Circuit in employment discrimination litigation and similar cases requiring comparable skill, effort, and responsibility.

10. My current hourly rate charged for mediation services is \$500 an hour. My last fee award in the United States District Court for the Northern District of Alabama was in March 2022 when I received a fee award based on a rate of \$500 an hour. (*Trantham v Socoper, Inc.; 1:16-cv-1476-KOB* (Docs. 248-249)). My last fee award in the United States District Court for the Middle District of Alabama was June 2022 when I received a fee award based on a rate of \$400 an hour. (*Wiggins v. The City of Montgomery, Alabama; 2:17-cv-425-KFP* (Doc. 165)). In discussing my rates with other lawyers of comparable experience and skill, I have found my rates to be in the middle of what is acceptable. The prevailing hourly rates for lawyers handling plaintiff's employment case range from \$375 an hour to \$650 per hour depending on the skill and experience of the litigator. For attorneys with 30 or more years of experience, the rate ranges from \$525 to \$650 per hour depending on the skill and experience of the litigator. For attorneys with 20 or more years of experience, the rate ranges from \$400 to \$550 per hour depending on the skill and experience of the

litigator. For attorneys with less than 15 years of experience, the rate ranges from \$375 to \$425 per hour depending on the skill and experience of the litigator.

11. The rates are reasonable because of the high risk of handling employment cases on the plaintiff's side. Summary judgment is granted at a very high rate in employment discrimination cases. Over the past few years, Amanda Farahany of the firm Barrett & Farahany has presented at both the Alabama State Bar's annual Labor and Employment Conference and the Cumberland School of Law's Annual Employment Law Update. In her presentations, she covered the crushing rates at which summary judgment has been granted in employment cases in the District Courts in the Eleventh Circuit. The study showed that summary judgment was granted in more than 70% of the employment discrimination cases filed. As a result of the high summary judgment rates, the number of qualified attorneys willing to take on the risk of an employment discrimination case for an employee has dramatically dropped. I observed this decline in monitoring the membership of the Alabama State Bar's Labor and Employment Section and the Alabama affiliate for the National Employment Lawyers Association. I have seen qualified and experienced attorneys flee our ranks and/or significantly reduce the number of employment cases they are taking because of the high risk of summary judgment being granted and the low chance for a reasonable settlement prior to summary judgment briefing. Fewer and fewer attorneys entering the profession are joining the practice

groups and organizations for plaintiff's employment lawyers, suggesting to me that newer attorneys are not filing employment discrimination cases.

12. Representing employees in employment litigation is risky and difficult. It requires: (1) organization and efficiency in the marshaling of facts, evidence, and theories of liability so that false starts or wasted efforts were minimized; (2) a thorough comprehension of the substantive and procedural law and policy arguments; (3) case assessment which weeds out unproductive theories and claims, and which concentrates energies on the points which are most likely to prevail; and (4) experience in presenting evidence and theories to the Court. These characteristics necessitate the requested hourly for the current case.

13. The risk inherent in handling employment cases is that representation is done on a contingency basis where the lawyer frequently works for years without any compensation and face the risks that they will not be paid for the work they have done or expenses they have advanced. This is the standard form of representation in employment discrimination matters since most plaintiffs have lost employment and are unable to afford a retainer, flat-fee, or hourly fee arrangement.

a. Ms. Key is on a contingency fee agreement, so I have not been paid for any of the work that I have performed, nor have I been reimbursed for the expenses that I have paid.

b. When I agreed to work with Ms. Palmer on this case on a contingency basis, I did so knowing that that the case would involve a tremendous amount of work with no hope of compensation for years.

c. Because Ms. Palmer and I are sharing/splitting the contingency fee that we recover,¹ the contingency compensation will be inadequate to reimburse us for the time we have invested in the case.

d. Without an attorney's willingness to accept a plaintiff's case on a contingent basis, the plaintiff would likely not be able to obtain representation in the current case in the State of Alabama.

14. The high rate at which summary judgment is granted deters many lawyers from taking employment cases and heightens the risk of handling these types of cases. Even in strong cases, summary judgment is granted at a high rate. For this reason, most employers/defendants will not engage in meaningful settlement discussions until after the court has ruled on summary judgment (if then); the employers are “playing the odds” that at least part of the case will be resolved in their favor at summary judgment. This means that by the time a case is ready for settlement discussions, a lawyer will have invested a substantial amount of time and expenses in litigation. Unfortunately, employment litigation is quite lucrative for the defense bar, but only the most skilled and dedicated

¹ Ms. Key's fee agreement provides that any fees awarded to the Court will be credited against her contingency fee owed.

members of the plaintiffs' bar can remain in this area of practice because of the high risk and low profitability. This is not because good cases do not exist - they do. This trend is because of the high rate at which summary judgment is granted and the low value employers are willing to pay. Employers are willing to gamble on the high summary judgment rates, especially with the comforting knowledge of statutory caps in most cases limiting their exposure if the gamble does not pay off. Therefore, attorneys' fee provisions in these federal statutes are important - they are the only way employees will be able to find lawyers who can afford to take cases to vindicate their rights. The attorneys' fee awards also discourage frivolous defenses and defendants rolling the dice on delaying settlement discussions until after briefing summary judgment. It is my understanding that this case was hotly contested by defendant, with several dispositive motions and motions to set aside the judgment file, which necessitated extensive briefing.

15. The high risk of handling an employment case on a contingency basis weigh heavily in favor of a solid hourly rate so that experienced and qualified litigators will take these cases which serve an important public interest. I am a solo practitioner with limited staff. I cannot afford the staff of a large firm because there is no guarantee as to when I will receive my next payment/fee. It would be irresponsible to commit myself to a payroll without the knowledge that I would be able to regularly meet it. This means that I am doing most if not all the work on any case I have accepted, including tasks which would normally be delegated to paralegals or law clerks.

16. When I accept or take on a case, it means that I do so to the exclusion of other work so that I can ensure that I have adequate time to handle my cases.

- a. Because of time dedicated in this case to depositions and trial, I had to decline offers to mediate matters. Had I been able to accept those offers, I would have earned \$500/hour for my work and been paid within thirty days of the mediation.
- b. Because of the additional time I had to spend out of my office travelling to Montgomery for depositions, hearings, and trials, I had to decline to meet with several potential clients because I would be out of town.
- c. I do not have another attorney in my firm to whom I can delegate work (or cover matters) when I am out of the office for depositions, court, or trial. When I accept a case, I do so only after reviewing my current case load, discovery deadlines (and associated commitments, such as depositions), dispositive motion deadlines, and trial settings. If I know that agreeing to work on a case will create a conflict with existing deadlines or trial settings, I must decline representation. Therefore, when I accept a contingency fee case, I am doing so knowing not only that I will not get paid for my work for years, but also that it means I will necessarily have to turn down other cases.²

² Having qualified counsel is a necessity to make sure that there are enough “hands” to handle all the work necessary for prosecuting a case at trial. Because of the smaller recoveries in employment cases (as compared to personal injury cases), the promise of a fee award is often the

Reasonableness of Time Sought

17. I have reviewed the hourly time sought for the preparation and trial of this case against the background of the foregoing factors as explained in *Norman v. Housing Authority of City of Montgomery*, 836F.2d 1292, 1300-1301 (11th Cir. 1988). The time sought is reasonable.

a. Starting in 2020, I began using Smokeball, a practice management software, with a billing program that operates on top of Microsoft products. In addition to permitting manual entry of time, Smokeball also tracks the active time the user spends in a Word document and in emails. All billing entries, whether those captured by the software or those entered manually, require the user to review and approve the entries. This ensures not only that the entries are accurate, but also that the lawyer is familiar with the time invested in the case. Attached as Exhibit 1 is an itemization of the expenses I incurred in this case. Attached as Exhibit 2 are the total billing records from Smokeball for me, my paralegal Christine Poynter, and my office manager, Jim Leonard, as well as from the billing software I used prior to 2020.

only reason a group of qualified attorneys can represent a plaintiff; the contingency fee will not come close to covering the time and expenses invested in the case. As is the case here where there is a litigation team of two solo practitioners, the fee award is the only way that our firms will be able to recoup the salary costs of that team in terms of the work expended on the case. Without the fee award, it does not make business sense for us to take employment discrimination cases.

Attached as Exhibit 3 are my reduced time records after a review of my billing records to eliminate time that was redundant, unnecessary, or not reasonably related to the issues resolved at trial and/or through post-trial motions.

- b. I have tried to be efficient and practical in determining what work to invest in the case. When time permitted, I tried to delegate to Ms. Poynter (my part-time paralegal) work which she could complete that did not require my knowledge or experience as a lawyer. In reviewing my total time (Ex 2), I eliminated time that was exclusive to dismissed claims, eliminating 37.4 hours. I did not eliminate time that may have been spent on a claim related to a dismissed party if that time and facts also related to an issue that was to be resolved at trial in the case against Dynamic.
- c. I am seeking \$172,142.50 for legal fees for my office calculated as follows:
 - i. 318.5 at \$500/hour for Heather Leonard (\$159,250)
 - ii. 102.9 hours at \$125/hour for Christine Poynter (\$12,862.50)
 - iii. 0.6 hours at \$50 an hour for Jim Leonard (\$30)
- d. The expenses I am claiming in this case are \$10,763:

Expense	Itemization	Cost.
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In-House Copies (Heather Leonard, PC)	10,900 copies at \$0.25/copy	\$2,725.00
Outside Copies (Staples)	Trial Exhibits, Depositions, and Post-Trial Motions	\$668.42
Process Server Ray Cureton Trial Subpoena	CLH Investigations	\$200
Witness Fee Checks and Mileage for Trial	Ray Cureton - \$66.07 Sherry Spires - \$ 308.75	\$374.82
Deposition – Davita Key	ACR	\$3,514.85
Deposition – Cassandra Williams	ACR	\$796.05
Deposition – Ray Cureton	Cite	\$2,000.17
Deposition - Robert Burns	Cite	\$2,117.24
Hotel for Trial – Heather Leonard	Springhill Suites	\$ 895.95
Hotel for Trial – Leslie Palmer	Springhill Suites	\$820.95

16. The proposed paralegal rate of \$125 per hour is also reasonable, as the local market for paralegal services for a skilled trial paralegal range from \$125 to \$250 an hour. Ms. Poynter has decades of experience working as litigation paralegal.

17. The proposed rate of \$50 an hour for Mr. Leonard is reasonable. He is the office manager for my firm but from time-to-time assists with case matters as needed. He has worked as my office manager since 2002, and through that time has gained knowledge of employment law such that he has been retained by other firms to serve as a trial consultant and help select juries.

18. I have reviewed the foregoing and declare under the penalty of perjury that the above is true and correct.

This the 28th day of March, 2024.



Heather Newsom Leonard
HEATHER LEONARD, PC
2105 Devereux Circle, Suite 111
Birmingham, AL 35243
(205) 977-5421
Heather@HeatherLeonardPC.com

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,)
Plaintiff,)
)
v.) Civil Action No.
) 2:19-cv-767-ECM-SMD
)
DYNAMIC SECURITY, INC.,)
Defendant.)

**DECLARATION OF HEATHER LEONARD IN SUPPORT OF THE
PLAINTIFF'S MOTION FOR AN AWARD OF ATTORNEY'S FEES AND
EXPENSES**

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
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DAVITA M. KEY,)
Plaintiff,)
)
v.) Civil Action No.
) 2:19-cv-767-ECM-SMD
)
DYNAMIC SECURITY, INC.,)
Defendant.)

**ITEMIZATION OF PLAINTIFF'S EXPENSES
INCURRED BY HEATHER LEONARD, PC**

Expense	Itemization	Cost.	Exhibit
In-House Copies (Heather Leonard, PC)	10,900 copies at \$0.25/copy	\$2,725.00	A
Outside Copies (Staples)	Trial Exhibits, Depositions, and Post-Trial Motions	\$668.42	B
Process Server Ray Cureton Trial Subpoena	CLH Investigations	\$200	C
Witness Fee Checks and Mileage for Trial	Ray Cureton - \$66.07 Sherry Spires - \$ 308.75	\$374.82	D
Deposition – Davita Key	ACR	\$2,281.65	E
Deposition – Cassandra Williams	ACR	\$796.05	E
Deposition – Ray Cureton	Cite	\$2,000.17	E
Deposition - Robert Burns	Cite	\$2,117.24	E
Hotel for Trial – Heather Leonard	Springhill Suites	\$ 895.95	F
Hotel for Trial – Leslie Palmer	Springhill Suites	\$820.95	F

* Not included in Bill of Costs

*

Heather Leonard PC - in-office
copies

Time

for Key v Hyund. Inc. | Dynamic Security



Expense entries

Date	Description	Quantity
3/23/2023	2023.03.23 - Staples - \$181.72 - Key Trial - Flip Chart, Visual Aids	1
10/20/2022	Billable Copies	625
2/7/2023	Billable Copies - Copies for Summary Judgment Hearing	268
3/13/2023	Billable Copies - Cureton 2023.03.13 - re subpoena mail	3
8/29/2022	Billable Copies - Def documents referencing witness for deposition	566
3/23/2023	Billable Copies - Defendant's Trial Exhibits	792
6/19/2022	Billable Copies - deposition exhibits for 30(b)(6) deposition - HMMA (will use in other depositions as well)	269
1/9/2023	Billable Copies - Doc. 90 - Show Cause on Motion to Strike Jury Demand	1
1/27/2023	Billable Copies - Doc. 100 - Dynamic Depo Designation	7
1/27/2023	Billable Copies - Doc. 101 - PL Witness List	163
1/27/2023	Billable Copies - Doc. 102 - PL Exhibit List	9
1/27/2023	Billable Copies - Doc. 103 - Reply on Motion to Strike Jury Demand	18
1/27/2023	Billable Copies - Doc. 104 - Motion to continue pretrial conference	3
2/3/2023	Billable Copies - Doc. 108 - Order to Show Cause	0
2/9/2023	Billable Copies - Doc. 122 - HMMA Obj to PL Witness List	3
2/9/2023	Billable Copies - Doc. 123 - HMMA Obj to Depo Designations	15
2/9/2023	Billable Copies - Doc. 124 - HMMA Obj to Exhibit Lists	32
2/9/2023	Billable Copies - Doc. 128 - HEA Obj to PL Depo Designations	116
2/9/2023	Billable Copies - Doc. 129 - HEA Obj to PL Exhibit List	6
2/9/2023	Billable Copies - Doc. 130 - Dynamic's Obj to Depo Designations	96
2/9/2023	Billable Copies - Doc. 131 - Dynamic's Obj to HEA Exhibit List	6
2/9/2023	Billable Copies - Doc. 132 - Dynamic's Obj to HMMA's Exhibit List	15
2/9/2023	Billable Copies - Doc. 133 - Dynamic's Obj to PL Exhibit List	19
2/9/2023	Billable Copies - Doc. 134 - Dynamic's Objections to Plaintiff's Witness List	3
2/22/2023	Billable Copies - Doc. 147 - Order on jury trial, extension, and reconsideration	0

2/28/2023 Billable Copies - Doc. 155 - Defendant's Voir Dire	8
3/8/2023 Billable Copies - Doc. 165 - Dynamic's Response to PL 1st MIL - Cureton as a Minister	7
3/8/2023 Billable Copies - Doc. 166 - Dynamic's response to PL 2nd MIL - Dismissed Claims	13
3/8/2023 Billable Copies - Doc. 167 - Dynamic response to PL 3rd MIL - EEOC Determination	5
3/8/2023 Billable Copies - Doc. 168 - Dynamic Response to PL 4th MIL - DOL Finding	5
3/8/2023 Billable Copies - Doc. 174 - Order Denying Interlocutory Appeal	6
3/16/2023 Billable Copies - Doc. 175 - Notice of Availability of Juror Profiles	2
3/24/2023 Billable Copies - Doc. 178 - Pretrial Order	10
7/11/2023 Billable Copies - Doc. 211 - Def Reply Brief on Post-Trial Motions	51
3/11/2024 Billable Copies - Doc. 212 - Order on post-trial motion	10
3/18/2024 Billable Copies - Doc. 213 - Memorandum Opinion and Order on Injunctive Relief	8
5/20/2020 Billable Copies - Doc. 23 - Motion to Amend Complaint	33
5/20/2020 Billable Copies - Doc. 24 - Response to Motion to Dismiss	24
7/15/2020 Billable Copies - Doc. 25 - HMMA MTD Reply	17
6/1/2020 Billable Copies - Doc. 27 - Order Granting Motion to Amend Complaint	0
6/2/2020 Billable Copies - Doc. 28 - Amended Complaint	28
6/2/2020 Billable Copies - Doc. 29 - Order Mooting MTDs	1
6/15/2020 Billable Copies - Doc. 31 - HEA MTD	14
6/15/2020 Billable Copies - Doc. 32 - Dynamic Security MTD	20
6/17/2020 Billable Copies - Doc. 33 - Briefing Order	1
7/8/2020 Billable Copies - Doc. 34 - Response to MTD	21
7/15/2020 Billable Copies - Doc. 36 - Dynamic Security MTD Reply	7
7/17/2020 Billable Copies - Doc. 37 - HEA MTD Reply	11
8/31/2021 Billable Copies - Doc. 38 - Order and Opinion on MTD	33
9/1/2021 Billable Copies - Doc. 40 - Order on When to Hold Rule 26 Conference	2
9/15/2021 Billable Copies - Doc. 42 - ANSWER to [28] Amended Complaint by Hyundai Engineering America, Inc..	22
9/15/2021 Billable Copies - Doc. 43 - Answer and Defenses to Plaintiff's Amended Complaint	31
9/23/2021 Billable Copies - Doc. 44 - MOTION for Extension of Time to File Report of Parties' Planning Meeting by Hyundai Motor Manufactu	2
9/27/2021 Billable Copies - Doc. 46 - REPORT of Rule 26(f) Planning Meeting	15
9/27/2021 Billable Copies - doc. 47 and Doc. 47-1 Joint Motion for Protective Order and Protective Order	12
9/27/2021 Billable Copies - Doc. 48 - Privacy Protective Order	6
11/8/2021 Billable Copies - Doc. 49 - ORDER: it is ORDERED that this matter is SET for a hearing by status and scheduling conference on 11	1
11/30/2021 Billable Copies - Doc. 51 - UNIFORM SCHEDULING ORDER Final Pretrial Conference set for 9.22.2022,	5

4/13/2022 Billable Copies - Doc. 58 - NOTICE by Equal Employment Opportunity Commission of Appearance by Kurt Fischer	2
11/15/2022 Billable Copies - Doc. 87 - Dynamic reply brief	26
1/27/2023 Billable Copies - Doc. 92 - Order moving pretrial conference	1
1/27/2023 Billable Copies - Doc. 93 - HMMA Witness List	3
1/27/2023 Billable Copies - Doc. 94 - HMMA Deposition Designations	2
1/27/2023 Billable Copies - Doc. 95 - HMMA Exhibit List	6
1/27/2023 Billable Copies - Doc. 96 - HEA Witness List	3
1/27/2023 Billable Copies - Doc. 97 - HEA Exhibit List	3
1/27/2023 Billable Copies - Doc. 98 - Dynamic Exhibit List	4
1/27/2023 Billable Copies - Doc. 99 - Dynamic Exhibit List	8
8/1/2023 Billable Copies - Docs. 194-196 - Trial Transcript	510
8/1/2023 Billable Copies - Docs. 194-196 - trial transcript	510
10/13/2022 Billable Copies - Dynamic MSJ Copies (Docs. 73-75)	830
10/12/2022 Billable Copies - HEA MSJ Copies (Docs. 69-71)	498
10/12/2022 Billable Copies - HMMA MSJ Copies (Docs 66-68)	663
3/24/2023 Billable Copies - Juror Responses	674
11/15/2022 Billable Copies - Motion to Strike	5
6/21/2022 Billable Copies - Outsource - Color copies of exhibits for deposition	1
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3/21/2023 Billable Copies - trial copies - deposition transcripts	332
3/21/2023 Billable Copies - Trial Exhibits	1518
3/28/2022 Billable Copies - Witness letters to Howell, Cureton, Scavella, Chambliss, and Robinson	5
9/6/2022 Billable Copies- Doc. 19 - DEPOSITION (Schutz) by Hyundai Motor Manufacturing Alabama LLC	103
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2/1/2023 Billable Copies-Doc. 105 - Exhibit List Defendant Dynamic Security, Inc.'s Amended Exhibit List by Dynamic Security, Inc.	8
2/1/2023 Billable Copies-Doc. 106 - ORDER: it is ORDERED that unopposed motion to continue (doc. [104]) is GRANTED and the pretrial c	1
2/1/2023 Billable Copies-Doc. 107 - MOTION for Leave to File Amended Exhibit List by Hyundai Motor Manufacturing Alabama, LLC	3
2/6/2023 Billable Copies-Doc. 109- Deposition Designations (Responsive Designations of Deposition/Trial Excerpts) by Hyundai	4
2/6/2023 Billable Copies-Doc. 111 - MOTION for Leave to File - Defendant Hyundai ENG America, Inc.'s Motion for Leave to Amend its Tria	3

2/6/2023 Billable Copies-Doc. 113 - Response to Order re [108] Order to Show Cause, [107] MOTION for Leave to File	3
2/6/2023 Billable Copies-Doc. 114 - ORDER granting [107] Motion for Leave to Amend Exhibits List. Signed by Chief Judge Emily C. Marks	1
2/6/2023 Billable Copies-Doc. 115 - ORDER: it is ORDERED that on or before February 7, 2023, the Plaintiff shall show cause why the [111]	1
2/6/2023 Billable Copies-Doc. 116 - Exhibit List (As Amended) by Hyundai Motor Manufacturing Alabama, LLC	6
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2/9/2023 Billable Copies-Doc. 121 - Exhibit List - Amended Trial Exhibit List by Hyundai Engineering America, Inc	3
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2/21/2023 Billable Copies-Doc. 142 through Doc. 142-32 - Exhibit List Plaintiff's Response to Dynamic Objections by Davita M. Key	190
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2/21/2023 Billable Copies-Doc. 146 - MOTION for Extension of Time to File Defendant Dynamic Security, Inc.'s Motion for Enlargement of Ti	12
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3/1/2023 Billable Copies-Doc. 156 - First MOTION in Limine Defendant Dynamic Security, Inc.'s First Motion In Limine to Exclude Plaintiff'	9
3/1/2023 Billable Copies-Doc. 157 - Second MOTION in Limine Defendant Dynamic Security, Inc.'s Second Motion in Limine	7
3/1/2023 Billable Copies-Doc. 158 - Third MOTION in Limine Defendant Dynamic Security, Inc.'s Third Motion In Limine	5
3/1/2023 Billable Copies-Doc. 159-Fourth MOTION in Limine Defendant Dynamic Security, Inc.'s Fourth Motion In Limine to Exclude Ques	5
3/1/2023 Billable Copies-Doc. 160 - Fifth MOTION in Limine Defendant's Fifth Motion In Limine to Exclude Any Reference to Plaintiff	5
3/1/2023 Billable Copies-Doc. 161 - Proposed Jury Instructions by Dynamic Security, Inc..	36
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3/8/2023 Billable Copies-Doc. 170 - RESPONSE in Opposition re [158] Third MOTION in Limine Defendant Dynamic Security, Inc.'s	5
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3/8/2023 Billable Copies-Doc. 172 - RESPONSE in Opposition re [160] Fifth MOTION in Limine Defendant's Fifth Motion In Limine	5

3/8/2023 Billable Copies-Doc. 173 - BRIEF/MEMORANDUM in Opposition re [161] Proposed Jury Instructions filed by Davita M. Key	8
3/20/2023 Billable Copies-Doc. 176 and 176-1 - BILL OF COSTS by Hyundai Motor Manufacturing Alabama, LLC.	9
3/20/2023 Billable Copies-Doc. 177 and 177-1 - BILL OF COSTS by Hyundai Engineering America, Inc., Hyundai Motor Manufacturing Alaba	10
3/27/2023 Billable Copies-Doc. 181 - Proposed Jury Verdict Form by Dynamic Security, Inc.	4
4/27/2023 Billable Copies-Doc. 197 - MOTION for Judgment as a Matter of Law Defendant Dynamic Security, Inc.'s Motion for Renewed Jud	72
4/27/2023 Billable Copies-Doc. 198 ORDER: it is ORDERED that the Dft shall file a response to the Plf's	1
9/6/2022 Billable Copies-Doc. 20 - DEPOSITION (Muldrow) by Hyundai Motor Manufacturing Alabama LLC. (A	87
5/3/2023 Billable Copies-Doc. 200-MOTION for Extension of Deadline Time to File Petition for Attorneys' Fees and Bill of Cost	3
6/28/2023 Billable Copies-Doc. 206 - RESPONSE in Opposition re [197] MOTION for Judgment as a Matter of Law Defendant	60
7/6/2023 Billable Copies-Doc. 208 - MOTION for Extension of Time to File Response/Reply as to [206] Response in Opposition to Motion	3
6/28/2023 Billable Copies-Doc. 209 - RESPONSE in Opposition re [193] MOTION for Equitable Relief of Reinstatement of Interest filed by D	9
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9/21/2022 Billable Copies-Doc. 23 - REPLY to re [22] filed by Hyundai Motor Manufacturing Alabama LLC	48
1/18/2022 Billable Copies-Doc. 53 - ORDER: Construing the 52 Motion to Substitute Counsel as a Motion to Withdraw as Counsel;	1
1/18/2022 Billable Copies-Doc. 54 - NOTICE of Appearance by Thomas Matthew Miller on behalf of Hyundai Engineering America, Inc. (Mill	3
1/18/2022 Billable Copies-Doc. 55 - NOTICE of Appearance by Cortlin Lee Bond on behalf of Hyundai Engineering America, Inc.	3
3/28/2022 Billable Copies-Doc. 56 - MOTION to Amend/Correct [51] Scheduling Order	6
3/31/2022 Billable Copies-Doc. 57 - Order that Motion to Amend be granted	4
4/27/2022 Billable Copies-Doc. 62 - ORDER: it is ORDERED that the Board's [59] Motion to Quash is DENIED, as further set out in Order	2
8/22/2022 Billable Copies-Doc. 64 - ORDER: Now pending before the Court is Plaintiff Davita M. Key's motion	2
9/15/2022 Billable Copies-doc. 65 - Notice of Mediation and Settlement Conference by Davita M. Key	3
10/14/2022 Billable Copies-Doc. 72-MOTION for Leave to File Supplemental Brief by Hyundai Motor Manufacturing Alabama, LLC.	4
10/13/2022 Billable Copies-Doc. 77 - ORDER TO SHOW CAUSE, by the PLF, as to why the [72] Motion	1
10/25/2022 Billable Copies-Doc. 79 - 792 - RESPONSE in Opposition re [72] MOTION for Leave to File Supplemental Brief filed by Davita M. K	24
10/27/2022 Billable Copies-Doc. 80 - ORDER: it is ORDERED that Dft's [72] Motion for Leave to File Supplemental Brief is DENIED	2
11/7/2022 Billable Copies-Doc. 82 - BRIEF/MEMORANDUM in Opposition re [68] Evidentiary Submission	85
11/11/2022 Billable Copies-doc. 86 - REPLY BRIEF re [70] BRIEF/MEMORANDUM in Support, [71] Evidentiary Submission	16
1/2/2023 Billable Copies-Doc. 89 - MOTION to Strike Plaintiff's Demand for Jury Trial by Dynamic Security, Inc..	80
1/19/2023 Billable Copies-Doc. 91 - 91-2 - RESPONSE in Opposition re [89] MOTION to Strike Plaintiff's Demand for Jury Trial	44
2/1/2023 Billable Copies-Doc. 92 - ORDER: it is ORDERED that the pretrial conference presently set for 2/2/2023, is RESET to 11:00 AM or	1
11/11/2022 Billable Copies-MOTION for Extension of Time to File Response/Reply as to [82] BRIEF/MEMORANDUM	7
3/29/2023 Billable Copies-MOTION for Judgment as a Matter of Law Defendant Dynamic Security Inc.'	6
1/13/2022 Billable Copies-MOTION to Substitute Attorney by Hyundai Engineering America, Inc..	3



Receipt

Order Details

Order Number:	6936084803
Order Date:	Mar. 21, 2023
Delivery items ship to	
Pickup products at	Birmingham Store 4614 Hwy 280 Birmingham, AL 35242

Payment Details

INVOICE TO
 James Leonard
 2105 Devereux Circle
 Suite 111, Vestavia Hills, AL35243

Payment Method

PayOnline

Trial Copies**Order Summary**

ITEM	QTY	PRICE
Pickup Products		
Trial Exhibits to Print.pdf	5	\$194.81
Trial Exhibits to Print.pdf	1	\$48.20
8044773 Key.Davita M. 062022.miniprint.pdf	3	\$55.57
CuretonRay083022-CT.pdf	3	\$58.59
Key v Hyundai, Dynamic, Spiers-CT-LE.pdf	3	\$28.70
Key v Hyundai, Riddle-CT-LE.pdf	3	\$70.32
UnemploymentHearingTranscription,9-19-17-CT.pdf	3	\$23.37
WILLIAMS, Cassandra 09.06.2022_cond_N_ex_CERTIFIED ORIGINAL (blue).pdf	3	\$38.66
Subtotal		\$518.22
Estimated Tax		\$25.91
Total		\$544.13



8/19/2022 Billable Copies-MOTION to Take Deposition from Cassandra Williams/HCA 30(b)(6) on September 6, 2022
8/22/2022 Billable Copies-Print pages for deposition preparation Ray Cureton

4
127
10900

Total - Billable
Total - Non-Billable
Total - Write Off

Staples**Receipt****Order Details**

Order Number	6935572727
Order Date	Feb.07,2023
Delivery items ship to	
Pickup products at	4614 Hwy 280, Birmingham, AL 35242

Payment Details

INVOICE TO
Jim Leonard 2105 Devereux Circle, Suite 111, Birmingham, AL 35243
PAYMENT METHOD
PayOnline

Trial Notebook**Order Summary**

ITEM	QUANTITY	PRICE
Pickup Products		
Key v HMMA Notebook (Simple Print)	1	\$54.63
SUBTOTAL		\$54.63
SHIPPING & HANDLING		\$0.00
ESTIMATED TAX		\$2.74
TOTAL		\$57.37



6935572727

All orders must be paid for at the time of
order to be entered into production.

Staples

4614 Hwy 280
Birmingham, AL 35242
205-980-0596

Sale

Store: 1188 Register: 5
Date: 8/3/23 Time: 11:11 AM
Transaction: 13019 Cashier: 2032642

Copies of
post-trial
motions
(

REWARDS NUMBER 2847798069

Qty	Item	Price	Amount
280	SELF-SERVE B&W POS		
	24517274	0.18	50.40
	STPLS HD VIEN BIND		
1	718103406420	10.99	10.99

Subtotal 61.39
ALABAMA 9% 5.53

Total 66.92
AMERICAN EXPRESS USD\$66.92

Card No. : [REDACTED]

Contactless

Auth No. : 837738

Mode.: Issuer

AID.: A000000025010801

TVR.: 000008000

IAD.: 06580103A02002

TSI.: E800

ARC.: 3030

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(334) 618-0498
clhinvestigations@gmail.com

March 21, 2023

Heather Newsom Leonard
Heather Leonard, P.C.
2105 Devereux Circle, Suite 111
Birmingham, Alabama 35243

RE: Key v. Dynamic Security

Traveled to 1261 Cross Creek Road, Prattville, AL on
three occasions (no answer at door); telephone Mr.
Cureton; research Mr. Cureton's current address;
service perfected upon Ray Cureton at
749 Charlemont Lane, Montgomery, AL 36117

\$200.00

*Thank you
Charlotte L. Henderson*



IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,)
Plaintiff,)
)
v.) Case No.
) 2:19-cv-767-ECM-SMD
)
DYNAMIC SECURITY, INC.,)
Defendants.)

Witness Fee Checks

Name	Amount	Entered in Billing?
Ray Cureton	\$66.07	✓
Sherry Spires	\$308.75	✓

Scans of Checks available
on request - not scanned &
filed w/bill of cost to
avoid banking info being
in the record



Alabama Court Reporting, Inc.

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 Huntsville, AL 35801
 Phone: (877) 478-3376



Accounts Payable Esquire Solutions
 Esquire Deposition Solutions, LLC
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 Suite 100
 Atlanta, GA 30344

Invoice #38157

Date	Terms
07/05/2022	Due on receipt

Depo/Job #35114 on 06/20/2022

Affiliate Depo/Job#: (Esquire job #J8044773)

Case: Davita M. Key v. Hyundai Motor

Manufacturing Alabama, LLC; Hyundai
 Engineering America, Inc.; and Dynamic
 Security, Inc.

Court Docket#: 2:19-CV-00767-ECM-SMD

Location: Hyundai Training Center
 700 Hyundai Boulevard, Gate 3
 Montgomery, AL 36105

Shipped On: 07/05/2022

Shipped Via: Electronic Only

Tracking #: Esquire Portal

Delivery Type: Normal

Resource: Lewis, Sabrina

Description	Amount
Davita M. Key	
Appearance Fee Full Day	\$ 200.00
Transcript Original	\$ 1,033.20
Transcript Copy	\$ 2,281.65
	<hr/>
	\$ 3,514.85
Amount Due:	\$ 3,514.85
Paid:	\$ 3,514.85

Esquire Job #J8044773

Balance Due:	\$ 0.00
Payment Due:	Upon Receipt

*READ & SIGN REQUESTED BY HEATHER LEONARD
 ORIG EXH SENT 7-1-22*

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Heather Leonard, Esq.
 Heather Leonard, P.C.
 2105 Devereux Circle
 Suite 111
 Birmingham, AL 35243

Invoice #39077

Date	Terms
09/21/2022	Due on receipt

Depo/Job #36228 on 09/06/2022

Case: Davita M. Key v. Hyundai Motor Manufacturing Alabama, LLC; Hyundai Engineering America, Inc.; and Dynamic Security, Inc.

Shipped On:
Shipped Via: Etrans w/UPS shipped orig exh
Delivery Type: Normal
Resource: Groves, Jordan

Court Docket#: 2:19-CV-00767-ECM-SMD

Location: Bradley, Arant, Boult & Cummings LLP
 (Montgomery)
 RSA Dexter Avenue Building
 445 Dexter Avenue, Suite 9075
 Montgomery, AL 36104

Description	Amount
Cassandra Williams	
Appearance Fee Half Day	\$ 100.00
Transcript Original	\$ 573.05
Condensed w/Hyperlinked Exhibits	\$ 55.00
Exhibits, Scanned	\$ 24.00
Transcript Cloud Storage, per deponent	\$ 12.00
Shipping	\$ 32.00
	\$ 796.05

Amount Due:	\$ 796.05
Paid:	\$ 0.00

*Electronic Delivery + Original exhibits returned via UPS
 Read & Sign sent via email to T. Matthew Miller - mmiller@bradley.com;
 lhawkins@bradley.com*

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1 of 1



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 Heather Leonard, PC
 2105 Devereux Circle
 Suite 111
 Vestavia, AL 35243-2564

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20035	9/13/2022	11899		
Job Date	Case No.			
8/30/2022	2:19-CV-767-ECM-SMD			
Case Name				
Key v. Hyundai Motor Manfacturing Alabama LLC., et al.				
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Ray Cureton				732.32
Half Day Per Diem	1.00	@	80.000	80.00
Technical/Video	199.00	Pages	@	0.550
Scanned exhibits	128.00		@	0.300
Processing	1.00		@	20.000
Ray Cureton - Video				400.00
Setup and First Hour	1.00		@	300.000
Additional Video Hour	3.00	Hours	@	100.000
Synchronized Video Hour	4.00	Hours		
Video archiving	1.00		@	20.00
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Job No. : 11899
 BU ID : CITE BHAM
 Case No. : 2:19-CV-767-ECM-SMD
 Case Name : Key v. Hyundai Motor Manfacturing Alabama LLC., et al.

I N V O I C E

1 of 1



Leslie Palmer
 Palmer Law, LLC
 104 23rd Street South
 Suite 100
 Birmingham, AL 35233

Invoice No.	Invoice Date	Job No.		
19091	7/6/2022	11184		
Job Date	Case No.			
6/22/2022	2:19-CV-767-ECM-SMD			
Case Name				
Key v. Hyundai Motor Manfacturing Alabama LLC., et al.				
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Robert Burns	388.00	Pages	@	3.680	1,427.84
Full Day Per Diem	1.00		@	160.000	160.00
Conference Room	1.00		@	420.000	420.00
Scanned exhibits	298.00		@	0.300	89.40
Processing	1.00		@	20.000	20.00
	TOTAL DUE >>>				\$2,117.24

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 Suite 100
 Birmingham, AL 35233

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Montgomery, AL 36106

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 Case No. : 2:19-CV-767-ECM-SMD
 Case Name : Key v. Hyundai Motor Manfacturing Alabama LLC., et al.

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Heather/Mrs Leonard	Room: 411			
2105 Devereux Cir Ste 111	Room Type: KSOF			
Vestavia AL 35243-2564	Number of Guests: 2			
Travel	Rate: \$303.00 Clerk: DSW			
Arrive: 26Mar23	Time: 04:29PM	Depart: 29Mar23	Time: 07:57AM	Folio Number: 71304

DATE	DESCRIPTION	CHARGES	CREDITS
26Mar23	Daily Parking	25.00	
26Mar23	Room Charge	185.00	
26Mar23	State Occupancy Tax	7.40	
26Mar23	City Tax	20.35	
26Mar23	County Tax	2.25	
27Mar23	Daily Parking	25.00	
27Mar23	Room Charge	220.00	
27Mar23	State Occupancy Tax	8.80	
27Mar23	City Tax	24.20	
27Mar23	County Tax	2.25	
28Mar23	Daily Parking	25.00	
28Mar23	Room Charge	303.00	
28Mar23	State Occupancy Tax	12.12	
28Mar23	City Tax	33.33	
28Mar23	County Tax	2.25	
29Mar23	American Express		895.95

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2105 Devereux Cir Ste 111 Room Type: KSOF
Vestavia AL 35243-2584 Number of Guests: 2
Travel Rate: \$303.00 Clerk: DSW

Arrive: 26Mar23 **Time: 06:41PM** **Depart: 29Mar23** **Time: 07:58AM** **Folio Number: 71305**

DATE	DESCRIPTION	CHARGES	CREDITS
26Mar23	Room Charge	185.00	
26Mar23	State Occupancy Tax	7.40	
26Mar23	City Tax	20.35	
26Mar23	County Tax	2.25	
27Mar23	Room Charge	220.00	
27Mar23	State Occupancy Tax	8.80	
27Mar23	City Tax	24.20	
27Mar23	County Tax	2.25	
28Mar23	Room Charge	303.00	
28Mar23	State Occupancy Tax	12.12	
28Mar23	City Tax	33.33	
28Mar23	County Tax	2.25	
29Mar23	American Express		820.95

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**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,)
Plaintiff,)
)
v.) Civil Action No.
) 2:19-cv-767-ECM-SMD
)
DYNAMIC SECURITY, INC.,)
Defendant.)

**DECLARATION OF HEATHER LEONARD IN SUPPORT OF THE
PLAINTIFF'S MOTION FOR AN AWARD OF ATTORNEY'S FEES AND
EXPENSES**

Exhibit 2

Date	Activity	Subject	Description	Staff	Duration
3/25/2024		Services provided on 3/25/2024	- 1 message sent/reviewed (0.10 hrs)	Christine Poynter	0.1
3/14/2024		Services provided on 3/14/2024	n - DOC 280 - ORDER ON FEES reviewed (0.1	Christine Poynter	0.1
			- Trial Transcript 1 Summary edited and reviewed (2.90 hrs)		
			- Doc. 194 - Trial Transcript VOlume I - March 27, 2023 reviewed (1.00 hrs)	Christine Poynter	3.9
8/9/2023		Services provided on 8/9/2023	- Trial Transcript 1 Summary edited (3.00 hrs)		
			- Doc. 194 - Trial Transcript VOlume I - March 27, 2023 reviewed (1.50 hrs)	Christine Poynter	4.5
8/8/2023		Services provided on 8/8/2023			
8/7/2023		Services provided on 8/7/2023	wed regarding Summarize Trial Transcript - 8	Christine Poynter	0.2
			- Doc. 195 - Trial Transcript Volume II - March 28, 2023 reviewed (0.10 hrs)		
			- Summary Template edited (0.60 hrs)		
			- Doc. 194 - Trial Transcript VOlume I - March 27, 2023 reviewed (0.70 hrs)		
			- Trial Transcript 1 Summary created, then reviewed (0.40 hrs)		
			- 1 email sent/reviewed regarding Summarize Trial Transcript - 8.8 per HL		
8/5/2023		Services provided on 8/5/2023	(0.10 hrs)	Christine Poynter	1.9

- PL - Motion for Equitable Relief reviewed
(0.10 hrs)
- Doc. 207 - RESPONSE in Opposition re
[193] MOTION for Equitable Relief of
Reinstatement of Interest filed by Dynamic
Security, Inc.. reviewed (0.10 hrs)
- PL - Response to Def Post Trial Motions V3
reviewed (0.10 hrs)
- Doc. 206 - RESPONSE in Opposition re
[197] MOTION for Judgment as a Matter of

6/28/2023

Services provided on 6/28/2023

Law Defendant reviewed (0.10 hrs)

Christine Poynter

0.4

			- Exhibit 2 reviewed (0.10 hrs)	
			- Jefferson v. Sewon Am., Inc reviewed (0.10 hrs)	
			- Doc. 193 - MOTION EQUITABLE RELIEF OF REINSTATEMENT AND INTEREST by Davita M. Key reviewed (0.10 hrs)	
			- Doc. 186 - ORDER AND JUDGMENT After this case had been presented to a jury, a verdict was returned reviewed (0.10 hrs)	
			- 5 emails sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v.	
6/15/2023	Services provided on 6/15/2023		Dynamic Security, Inc. Order (0.10 hrs)	Christine Poynter 0.5
6/8/2023	Services provided on 6/8/2023		Security Claims (Littler Mendelson (Jay St. Cl	Christine Poynter 8
4/25/2023	Services provided on 4/25/2023		EELIEF OF REINSTATEMENT AND INTEREST by	Christine Poynter 0.1

- 81-5 Ex 5 Latunya Howell Statement reviewed (0.10 hrs)
- Doc. 81-9 - Exhibit 9 - HMMA Safety Handbook reviewed (0.10 hrs)
 - Riddle Outline reviewed (0.10 hrs)
- Doc. 138-MEMORANDUM OPINION AND ORDER it is ORDERED reviewed (0.10 hrs)
- Memo to HL re interlocutory appeal re jury request reviewed (0.10 hrs)
- Doc. 174 - Order Denying Interlocutory Appeal reviewed (0.10 hrs)
- Def HMMA 2021.10.12 Re deficiencies in Rule 26 Disclosures reviewed (0.10 hrs)
 - Key- Kristal Riddle depo summary reviewed (0.10 hrs)
- Signed Fee Agreement reviewed (0.10 hrs)
- Contingency Fee Agreement - 2020 - joint with Leonard and Palmer reviewed (0.10 hrs)
 - 1 email sent/reviewed regarding Key v HMMA, et al - HEA Insurance Coverage

3/30/2023

Services provided on 3/30/2023

(0.10 hrs)

Christine Poynter

1.1

3/29/2023	<p>Matter of Law Defendant Dynamic Security Inc.'s reviewed (0.10 hrs)</p> <ul style="list-style-type: none"> - 1 email sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Motion for Judgment as a Matter of Law (0.10 hrs) - 1 message sent/reviewed (0.10 hrs) <p>Services provided on 3/29/2023</p> <p>Christine Poynter 0.3</p>
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3/27/2023		Services provided on 3/27/2023	attended (8.00 hrs)	Christine Poynter	8.8
3/22/2023	DISCO	:christine and Abby put together Exhibit Ine and Abby put together Exhibit Notebooks :		Christine Poynter	1.5

- Doc. 81-20 - Exhibit 20 - Peoples July 31
 Email reviewed (0.10 hrs)
 - Doc. 138-MEMORANDUM OPINION AND
 ORDER it is ORDERED reviewed (0.20 hrs)
 - Doc. 142-7 - Ex. Px 17 Complaint - Exhibit
 List Plaintiff's response to Dynamic
 Objections by Davita M. Key reviewed (0.10
 hrs)
 - Ex C Amended Complaint redacted
 reviewed (0.10 hrs)
 - Doc. 43 - Dynamic Security, Inc.'s Answer
 and Defenses to Plaintiff's Amended
 Complaint ANSWER to 28 Amended
 Complaint reviewed (0.10 hrs)
 - Doc. 28 - Amended Complaint reviewed
 (0.10 hrs)
 - Doc. 70 - MSJ Brief for HEA reviewed (0.10
 hrs)
 - Trial (Courtroom 2A Frank M. Johnson
 Federal Courthouse (Montgomery, AL))

		- Zoom Trial Deposition for Gloria Robinson (Zoom) attended (2.00 hrs)		
3/20/2023	Services provided on 3/20/2023	- Zoom trial deposition of Nicole Scavella attended (1.00 hrs)	Christine Poynter	3
		- Px 37- email 11.13.18 Williams, Spires and others re Dynamic and HMMA charge reviewed (0.10 hrs)		
		- Px 36- email 11.13.18 Williams, Spires and others re Dynamic EEOC charge reviewed (0.10 hrs)		
3/19/2023	Services provided on 3/19/2023	- Px 23- Key removal from Hyundai discipline report reviewed (0.10 hrs)	Christine Poynter	0.3
3/8/2023	Services provided on 3/8/2023	- Order Denying Interlocutory Appeal reviewe	Christine Poynter	0.2

- Doc. 163 - Defendant Dynamic Security's Motion to Certify for Intercalary Appeal and Continue Trial Setting reviewed (0.10)

三

Request created, then edited (0.20 hrs)

reviewed (0.10 hrs)

**MOTION to Strike Plaintiff's Demand for
Jury Trial by Dynamic Security, Inc..**

reviewed (0.10 hrs)

- 5 internal messages sent/reviewed (0.10 hrs)

Christine Poynter

9.6

Services provided on 3/7/2023

			- Doc. 98 - Dynamic Witness List reviewed (0.10 hrs)	
			- Doc. 105 - Exhibit List Defendant Dynamic Security, Inc.'s Amended Exhibit List by Dynamic Security, Inc. reviewed (0.10 hrs)	
			- Doc. 99 - Dynamic Exhibit List reviewed (0.10 hrs)	
			- Defendant Dynamic Security, Inc.'s Witness List (unredacted) - 01-26-2023 reviewed (0.10 hrs)	
			- Comparison of Exhibit Lists reviewed (0.10 hrs)	
			- Doc. 161 - Proposed Jury Instructions by Dynamic Security, Inc.. reviewed (0.10 hrs) - PL - Jury Charges - filed 2023.02.24 reviewed (0.10 hrs)	
			- Doc. 155 - Defendant's Voir Dire reviewed (0.10 hrs)	
			- Doc. 154 - Proposed Voir Dire by Davita M. Key reviewed (0.10 hrs) - PI Witness List - unredacted reviewed (0.10 hrs)	
			- 1 email sent/reviewed regarding Key v Dynamic - trial subpoenas and Rule 408 settlement discussions [IWOV-WSACTIVELLP.FID1997338] (0.10 hrs)	
			- Prepare Heather's Trial Notebook (0.50 hrs)	
3/6/2023	REV	Services provided on 3/6/2023	hrs)	Christine Poynter 1.6
3/1/2023		Review -	I file defendant's motion in Limine and jury in	Christine Poynter 0.2
3/1/2023		Services provided on 3/1/2023	re [155] Proposed Voir Dire filed by Davita M	Christine Poynter 0.1
2/24/2023		Services provided on 2/24/2023	Pretrial Order - 2023.02.23 reviewed (0.10 hr	Christine Poynter 0.1
2/22/2023		Services provided on 2/22/2023	on jury trial, extension, and reconsideration r	Christine Poynter 0.1
2/17/2023		Services provided on 2/17/2023	garding Key v. Dynamic - Rest to depo design	Christine Poynter 0.1

2/13/2023	Services provided on 2/13/2023	- Doc. 86 - REPLY BRIEF reviewed (0.10 hrs) created (0.10 hrs) - Subpoena to Ray Cureton created (0.10 hrs) - Subpoena to Dynamic's 30(b)(6) rep created (0.10 hrs) - Subpoena to Dynamic's 30(b)(6) rep created (0.10 hrs) - Subpoena to Hyundai Eng America's 30(b)(6) rep created (0.10 hrs) - Subpoena to Chris Hargrove created (0.10 hrs) - Subpoena to Custodian of Records for Alabama Dept. of Labor created (0.10 hrs) - Subpoena to Custodian of Records for the EEOC created (0.10 hrs) - Subpoena to Rebuttal Witness created, then edited (0.10 hrs) - PI Witness List - unredacted reviewed (0.10 hrs) - Subpoena to Davita Key created, then edited (0.10 hrs) - Subpoena to Tracy Peoples created, then edited (0.10 hrs) - Subpoena to Sherry Spires created, then edited (0.10 hrs) - Subpoena to Kristal Riddle created, then edited (0.10 hrs)	Christine Poynter	0.1
2/6/2023	Services provided on 2/6/2023	- Subpoena to Roberts Burns created, then edited (0.10 hrs)	Christine Poynter	1.9
1/30/2023	Services provided on 1/30/2023	Tax redacted_000395-000401 reviewed (0.1 hrs)	Christine Poynter	0.1

		- Response to Motion to Strike - HL Review reviewed (0.10 hrs)		
		- Doc. 81 - PLAINTIFFS EVIDENTIARY MATERIALS SUBMITTED IN OPPOSITION reviewed (0.10 hrs)		
		- DRAFT PLAINTIFF'S WITNESS AND EXHIBIT LIST created (0.10 hrs)		
		- PL - Initial Disclosures Served 2021-10-12 reviewed (0.10 hrs)		
		- 2022-1-28 PI Amended Initial Disclosures reviewed (0.10 hrs)		
		- DRAFT PLAINTIFF'S WITNESS AND EXHIBIT LIST created, then edited (0.30 hrs)	Christine Poynter	0.8
1/26/2023	Services provided on 1/26/2023	HEA Facts for DK Response reviewed (0.10 hr	Christine Poynter	0.1
1/4/2023	Services provided on 1/4/2023	D Key v. Hyundai Motor Manufacturing Alabai	Christine Poynter	0.1
11/11/2022	Services provided on 11/11/2022	I sent/reviewed regarding Great job on this (C	Christine Poynter	0.1
11/2/2022	Services provided on 11/2/2022	- Doc. 70 - MSJ Brief for HEA reviewed (0.20 hrs) - Citation Check Chart edited (0.30 hrs) - 1 email sent/reviewed regarding Citation Check Chart - completed (0.10 hrs)	Christine Poynter	0.6
10/27/2022	Services provided on 10/27/2022			

10/26/2022	Services provided on 10/26/2022	- Citation Check Chart edited and reviewed (0.90 hrs) - Doc. 70 - MSJ Brief for HEA reviewed (1.10 hrs) - Doc. 69 - MSJ by HEA reviewed (0.10 hrs) - Ex 20 Mailroom Job Duties reviewed (0.10 hrs) - SJ Brief fact check chart edited and reviewed (1.60 hrs) - 1 internal message sent/reviewed (0.10 hrs)	hrs)	Christine Poynter	3.9
10/25/2022	Services provided on 10/25/2022	- Doc. 78 - ORDER it is ORDERED that the [77] Order dated 10.13.2022, is VACATED reviewed (0.10 hrs) - Citation Check Chart created (0.30 hrs) - Citation Check Chart created (0.30 hrs) - Doc. 70 - MSJ Brief for HEA reviewed (0.20 hrs) - SJ Brief fact check chart created (0.70 hrs) - 1 internal message sent/reviewed (0.10 hrs)	hrs)	Christine Poynter	1.7
10/14/2022	Services provided on 10/14/2022	Supplemental Brief by Hyundai Motor Manufactu	hrs)	Christine Poynter	0.1

			- Client - Summary Judgment re HEA Doc. 70 MSJ created, then edited (0.10 hrs) - 4 emails sent/reviewed regarding Davita M. Key v. Hyundai, et al. (0.10 hrs)	Christine Poynter	0.2
10/13/2022	Services provided on 10/13/2022		- Doc. 23 - REPLY to re [22] filed by Hyundai Motor Manufacturing Alabama LLC reviewed (0.10 hrs) - Doc. 65 - Notice of Mediation and Settlement Conference by Davita M. Key reviewed (0.10 hrs) - 1 email sent/reviewed regarding Key v HMMA, HEA, and Dynamic - Notice Concerning Settlement and Mediation	Christine Poynter	0.3
9/21/2022	Services provided on 9/21/2022	(0.10 hrs)	Christine Poynter	0.3	
9/15/2022	Services provided on 9/15/2022	ation and Settlement Conference by Davita M. Key	Christine Poynter	0.1	

9/6/2022	Services provided on 9/6/2022	- Doc. 20 - DEPOSITION by written questions to Glenda Mudrow by Hyundai Motor Manufacturing Alabama LLC. (A reviewed (0.10 hrs)		
8/30/2022	Services provided on 8/30/2022	- Doc. 19-10-Ex. I - Dynamic Charge Detail Inquiry - DEPOSITION by Hyundai Motor Manufacturing Alabama LLC created (0.10 hrs) - HEA 30(b)(6)/Cassandra Williams Deposition (TBD) attended (7.50 hrs) tation of Ray Cureton (Palmer Law) attended (8	Christine Poynter	7.7 8

		- Doc Index and Quarterly Damages Calc edited (0.10 hrs)		
		- Key- Dynamic Security Index reviewed (0.10 hrs)		
		- 8044773 Key.Davita M. 062022.full reviewed (0.20 hrs)		
		- IMG-2495 reviewed (0.10 hrs)		
		- Depo Notes - Dynamic - Crystal Riddle/30(b)(6) reviewed (0.20 hrs)		
		- HEAPROD_003_export reviewed (0.20 hrs)		
		- Exhibit 11 reviewed (0.10 hrs)		
		- Exhibit 21 reviewed (0.10 hrs)		
		- Key- Dynamic Security Index reviewed (0.20 hrs)		
		- 2022-08-05 Declaration - Nicole Scavella reviewed (0.10 hrs)		
		- Review and pull documents for Ray Cureton Deposition (2.00 hrs)		
		- 1 internal message sent/reviewed (0.10 hrs)		
8/22/2022	Services provided on 8/22/2022	hrs)	Christine Poynter	3.5
8/19/2022	Services provided on 8/19/2022	n of Dynamic 30(b)(6) (Palmer Law) attended	Christine Poynter	7.5
6/20/2022	Services provided on 6/20/2022	ndai Blvd (700 Hyundai Blvd, Montgomery, AL)	Christine Poynter	8
4/4/2022	Services provided on 4/4/2022	. email sent/reviewed regarding Case (0.10 hr)	Christine Poynter	0.1
3/31/2022	Services provided on 3/31/2022	19-cv-00767-ECM-SMD Key v. Hyundai Moto	Christine Poynter	0.1

3/23/2022

Services provided on 3/23/2022

- DRAFT Answer to Dynamic's
Interrogatories edited (0.80 hrs)
- Go through client's file (paper and
electronic on Smokeball) to try to answer
the discovery requests (2.00 hrs)

Christine Poynter

2.8

HEA - Served 2021.12.13 reviewed (0.10 hrs)

- Davita Key v HMMA HEA and Dynamic - HEA's First Discovery Requests to Plaintiff 4871-4300-8527 v.1 reviewed (0.10 hrs)
- DRAFT PLAINTIFFS ANSWERS TO INTERROGATORIES AND RFP (1) reviewed (0.10 hrs)
 - DRAFT Answer to Dynamic's Interrogatories reviewed (0.10 hrs)
 - DRAFT ANSWERS TO INTERROGATORIES reviewed (0.10 hrs)
 - Dynamic Security, Inc. - Davita Key - Dynamic Security, Inc.'s First Requests for Production of Documents and Things to Plaintiff [EM 03-11-2022] reviewed (0.10 hrs)
 - DRAFT RESPONSES TO DYNAMIC'S RFP created (0.30 hrs)
 - DRAFT RESPONSES TO DYNAMIC'S REQUEST FOR ADMISSIONS created (0.10 hrs)
 - PLRFP Resp HMMA reviewed (0.10 hrs)
 - 3 emails sent/reviewed regarding Davita Key - Discovery requests (0.10 hrs)
 - 2 emails sent/reviewed regarding Davita Key v. Hyundai - DRAFT ANSWERS (word doc) TO DYNAMIC'S DISCOVERY REQUEST

Services provided on 3/21/2022

3/21/2022

Christine Poynter

			- DRAFT PLAINTIFF'S ANSWERS TO INTERROGATORIES AND RFP (1) reviewed (0.10 hrs)
			- DRAFT Answer to Dynamic's Interrogatories created, then edited (0.40 hrs)
			- DRAFT ANSWERS TO INTERROGATORIES reviewed (0.20 hrs)
			- Dynamic Security, Inc. - Davita Key - Dynamic Security, Inc.'s First Interrogatories to Plaintiff [EM 03-11-2022]
3/19/2022	Services provided on 3/19/2022	Christine Poynter	0.8
3/18/2022	Services provided on 3/18/2022	Christine Poynter	0.1
			- Client - Re Defendant's Discovery Requests to Plaintiff created (0.40 hrs)
			- 3 emails sent/reviewed regarding Davita Key v. Hyundai Motor Manufacturing Alabama (0.20 hrs)
3/16/2022	Services provided on 3/16/2022	Christine Poynter	0.6

**INTERROGATORIES AND RFP (1) reviewed
(0.20 hrs)**

- Quarterly Backpay Calculations reviewed
(0.20 hrs)
- PL - First RFA, Interrogatories, and RPD to HEA - Served 2021.12.13 reviewed (0.10 hrs)
- Key 000383-000385 reviewed (0.10 hrs)
 - Doc. 54 - NOTICE of Appearance by Thomas Matthew Miller on behalf of Hyundai Engineering America, Inc. (Miller, Thomas) reviewed (0.10 hrs)
- DMKey Interrogatories Answers reviewed (0.10 hrs)
 - DRAFT PLAINTIFF'S ANSWERS TO INTERROGATORIES AND RFP (1) created, then reviewed (0.40 hrs)
- EEOC_v_CMS_Final reviewed (0.10 hrs)
- 1 email sent/reviewed regarding Davita Key's Draft Answers to discovery requests from HEA (0.10 hrs)
- 1 email sent/reviewed regarding Case (0.10 hrs)
 - Go through client's file (paper and electronic on Smokeball) to try to answer the discovery requests (2.00 hrs)
- 1 internal message sent/reviewed (0.10 hrs)

3/1/2022

Services provided on 3/1/2022

hrs)

Christine Poynter

3.6

		- DRAFT ANSWERS TO INTERROGATORIES reviewed (0.10 hrs)		
2/23/2022	Services provided on 2/23/2022	- Type in HEA discovery responses for our answers and email to client and Leslie (0.60 hrs)	Christine Poynter	0.7
2/18/2022	Services provided on 2/18/2022	Shared with you: DRAFT PLAINTIFF'S ANSWER	Christine Poynter	0.1

- Doc. 47 - Joint Motion for Entry of Protective Order reviewed (0.10 hrs)
- Doc. 39 - Notice of Correction reviewed (0.10 hrs)
- Doc. 28 - Amended Complaint reviewed (0.10 hrs)
- DRAFT PLAINTIFF'S ANSWERS TO INTERROGATORIES AND RFP created, then edited and reviewed (0.80 hrs)
- Doc. 1 - Complaint reviewed (0.10 hrs)
- 6 emails sent/reviewed regarding Davita Key v HMMA HEA and Dynamic - HEA's First Discovery Requests to Plaintiff 4871-4300-8527 v.1.pdf (0.20 hrs)
- 1 email sent/reviewed regarding Responses (0.10 hrs)
- 2 emails sent/reviewed regarding Key v. Hyundai - DRAFT PLAINTIFF'S ANSWERS TO DISCOVERY (0.10 hrs)

2/17/2022

Services provided on 2/17/2022

DISCOVERY (0.10 hrs)

Christine Poynter

1.6

- Deposition Notice - Chambliss edited (0.10 hrs)	
- Deposition Notice - Gloria Robinson edited (0.10 hrs)	
- Deposition Notice - Howell edited (0.10 hrs)	
- Deposition Notice - Ray Cureton edited (0.20 hrs)	
- Deposition Notice - Scavella edited (0.10 hrs)	
- HEA Initial Disclosures 211012 reviewed (0.10 hrs)	
- Deposition Notice - Key, Davita created (0.10 hrs)	
- Deposition Notice - Williams, Cassandra created (0.10 hrs)	
- Deposition Notice - ROBERT BURNS created (0.10 hrs)	
- 30(b)(6) Deposition Notice - HMMA.docx reviewed (0.30 hrs)	
- Prepare deposition notices for all persons on the defendants' initial disclosures (1.00 hrs)	Christine Poynter
Services provided on 2/15/2022	2/15/2022

- Deposition Notice - Chambliss created (0.10 hrs)
- Deposition Notice - Gloria Robinson created, then reviewed (0.10 hrs)
- Deposition Notice - Scavella created (0.10 hrs)
- Deposition Notice - Ray Cureton created (0.10 hrs)
- Deposition Notice - Ray Cureton created (0.10 hrs)
- Deposition Notice - Howell created (0.20 hrs)
- Dynamic - Key - Initial Disclosures [EM 10-12-2021] reviewed (0.10 hrs)
- 30(b)(6) Deposition Notice LP Edits reviewed (0.10 hrs)
- HEA Initial Disclosures 211012 reviewed (0.10 hrs)
- HMMA's Rule 26 Mandatory Disclosures reviewed (0.10 hrs)

Services provided on 2/10/2022

Christine Poynter

1.1

2/10/2022

	- 1 email sent/reviewed regarding Davita M. Key v. Hyundai Motor Manufacturing Alabama, LLC, Hyundai Engineering America, Inc., and Dynamic Security, Inc. - Discovery Requests for You to Answer (0.10 hrs)	Christine Poynter	0.2
11/8/2021	Services provided on 11/8/2021 Hyundai - Discovery Requests (0.10 hrs)		

- Doc. 47 - Joint Motion for Entry of Protective Order reviewed (0.10 hrs)
- DRAFT RESPONSES TO REQUEST FOR PRODUCTION created (0.10 hrs)
- DRAFT RESPONSES TO RFP reviewed (0.70 hrs)
 - Discovery requests - Interrogatories reviewed (0.20 hrs)
 - HMMA's INT reviewed (0.10 hrs)
- DRAFT ANSWERS TO INTERROGATORIES created, then edited (0.40 hrs)
- Type in Defendant's Discovery Requests for (0.70 hrs)

Christine Poynter

2.3

11/4/2021

Services provided on 11/4/2021

			- HMMA's INT reviewed (0.10 hrs)	
			- Discovery requests - Interrogatories created, then edited (1.10 hrs)	
			- DRAFT RESPONSES TO RFP created, then edited (0.10 hrs)	
			- HMMA's RFP reviewed (0.10 hrs)	
			- 3 emails sent/reviewed regarding Davita M. Key v. Hyundai Motor Manufacturing Alabama, LLC, Hyundai Engineering America, Inc., and Dynamic Security, Inc. - Discovery Requests for You to Answer (0.10 hrs)	
11/3/2021	Services provided on 11/3/2021			Christine Poynter 1.5
10/18/2021	Services provided on 10/18/2021	Motion for Entry of Protective Order creat		Christine Poynter 0.1
			- Email attachment reviewed - Dynamic - Key - Initial Disclosures - 000001 - 000037 (0.20 hrs)	
			- 1 email sent/reviewed regarding Davita Key v. Dynamic Security, Inc. - Initial Disclosures and Production (0.10 hrs)	
			- Input HMMA's witnesses into the	
10/13/2021	Services provided on 10/13/2021	Smokeball witness chart (0.10 hrs)		Christine Poynter 0.4
3/18/2024	Review Doc. 213 - Memorandum Opinion and Order on Injunctive Relief			Heather Leonard 0.1

3/11/2024	ding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Memorandum Opinion and C	Heather Leonard	0.1
3/11/2024	Review Doc. 212 - Order on post-trial motions	Heather Leonard	0.2
3/11/2024	Call to Leslie re: post-trial motion	Heather Leonard	0.1
2/28/2024	PL - Jury Charges - filed 2023.02.24 reviewed	Heather Leonard	0.1
2/12/2024	PL - Obj to HMMA Witness and Exhibit List reviewed	Heather Leonard	0.1
2/6/2024	PL - Motion for Ext of Bill of Cost and Fees reviewed	Heather Leonard	0.1
2/6/2024	1 email sent/reviewed regarding Huge favor	Heather Leonard	0.1
11/14/2023	Doc. 149 - Proposed Jury Instructions by Davita M. Key reviewed	Heather Leonard	0.1
11/14/2023	ail sent/reviewed regarding Jury charges from case I had with Leslie (it is just retaliation)	Heather Leonard	0.1
11/1/2023	Pretrial Order - 2023.02.23 reviewed	Heather Leonard	0.1
11/1/2023	1 email sent/reviewed regarding Pretrial order language	Heather Leonard	0.1
10/11/2023	PL - Obj to Dynamic Exhibit List reviewed	Heather Leonard	0.1
8/16/2023	3 emails sent/reviewed regarding caselaw question	Heather Leonard	0.1
8/3/2023	1 email sent/reviewed regarding Post Trial Motoins	Heather Leonard	0.1
7/24/2023	t/reviewed regarding Littler Mendelson Invoice(s) June 2023 HEATHER LEONARD, P.C 091496	Heather Leonard	0.1
7/24/2023	1 email sent/reviewed regarding Case	Heather Leonard	0.1
7/21/2023	1 email sent/reviewed regarding Case	Heather Leonard	0.1
7/11/2023	Doc. 211 - Def Reply Brief on Post-Trial Motions reviewed	Heather Leonard	0.3
7/11/2023	oc. 210 - REPLY to Response to Motion re [193] MOTION for Equitable Relief reviewed	Heather Leonard	0.1
7/11/2023	ESPONSE in Opposition re [197] MOTION for Judgment as a Matter of Law Defendant reviewed	Heather Leonard	0.5
7/11/2023	Review Doc. 211 - Def Reply Brief on Post-Trial Motions	Heather Leonard	0.6
7/10/2023	1 email sent/reviewed regarding Key Reply - V1	Heather Leonard	0.1
7/10/2023	PL - Motion for Equitable Relief REPLY - HL Review created, then edited	Heather Leonard	0.3
7/6/2023	2 emails sent/reviewed regarding Contact Update Information	Heather Leonard	0.1
6/30/2023	Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Order on Motion for Extension of Time to Fi	Heather Leonard	0.1
6/29/2023	Key v. Dynamic: seeking agreement regarding extension of time for pending replies [IWOV-WSACTIVEVLLP.FI	Heather Leonard	0.1
6/28/2023	PL - Response to Def Post Trial Motions V3 edited	Heather Leonard	0.2
6/27/2023	1 email sent/reviewed regarding Rule 59 - V2	Heather Leonard	0.1
6/27/2023	1 email sent/reviewed regarding Key - response to post trial motions	Heather Leonard	0.1
6/27/2023	PL - Response to Def Post Trial Motions V3 created, then edited	Heather Leonard	0.5
6/24/2023	MOTION for Extension of Deadline Time to File Petition for Attorneys' Fees and Bill of Cost reviewed	Heather Leonard	0.1
6/24/2023	1 email sent/reviewed regarding Key Post Trial Motion Response	Heather Leonard	0.1
6/24/2023	of Law Defendant Dynamic Security, Inc.'s Renewed Motion for Judgment as a Matter of Law by Dynamic S	Heather Leonard	0.1

6/24/2023	PL - Response to Def Post Trial Motions created, then edited	Heather Leonard	8.4
6/12/2023	2 emails sent/reviewed regarding Dynamic Report	Heather Leonard	0.1
6/8/2023	nic - Key - Proposed Settlement Agreement - PL Proposed reevisions created, then edited	Heather Leonard	0.1
6/8/2023	Dynamic - Key - Proposed Settlement Agreement edited	Heather Leonard	0.9
6/8/2023	sent/reviewed regarding Key v Dynamic - proposed revisions to draft settlement agreement	Heather Leonard	0.1
6/8/2023	Mediation of Dynamic Security Claims (Littler Mendelson (Jay St. Clair)) attended	Heather Leonard	8
6/8/2023	wed regarding Key v Dynamic Security - mediation 6/8/2023 - Plaintiff's mediation position statement	Heather Leonard	0.1
6/6/2023	wed regarding Key v Dynamic Security - mediation 6/8/2023 - Plaintiff's mediation position statement	Heather Leonard	0.1
6/6/2023	Matter admin	Heather Leonard	0.1
6/5/2023	1 email sent/reviewed regarding Mediation Date/Time Location	Heather Leonard	0.1
6/5/2023	1 emails sent/reviewed regarding Key v Dynamic - mediation on 6/8 with Jay St Clair	Heather Leonard	0.2
6/5/2023	email sent/reviewed regarding Key v Dynamic Security - settlement communicaiton	Heather Leonard	0.2
6/5/2023	Email attachment reviewed - Mediation position statement	Heather Leonard	0.1
6/5/2023	wed regarding Key v Dynamic Security - mediation 6/8/2023 - Plaintiff's mediation position statement	Heather Leonard	0.1
6/5/2023	Mediation position statement created, then edited	Heather Leonard	2.2
6/5/2023	viewed regarding Key v HMMA, HEA, and Dynamic - Notice Concerning Settlement and Mediation	Heather Leonard	0.1
6/5/2023	amic Security Post-trial motions and Rule 408 discussion on request for injunctive relief [IWOV-WSACTIV	Heather Leonard	0.1
5/30/2023	Trial Prep Checklist reviewed	Heather Leonard	0.1
5/30/2023	Email attachment reviewed - Trial Prep Checklist	Heather Leonard	0.4
5/30/2023	1 email sent/reviewed regarding Key v Dynamic - trial prep checklist	Heather Leonard	0.3
5/24/2023	1 email sent/reviewed regarding Case	Heather Leonard	0.1
5/23/2023	1 email sent/reviewed regarding Key article for appeal	Heather Leonard	0.1
5/23/2023	1 email sent/reviewed regarding Mediation	Heather Leonard	0.1
5/11/2023	ails sent/reviewed regarding Key v. Dynamic Security Post Trial / Pre-Appeal Mediation	Heather Leonard	0.1
5/10/2023	1 email sent/reviewed regarding Key v. Dynamic Security 2:19-cv-00767-ECM	Heather Leonard	0.1
5/9/2023	amic Security Post-trial motions and Rule 408 discussion on request for injunctive relief [IWOV-WSACTIV	Heather Leonard	0.1
5/9/2023	ils sent/reviewed regarding Key/Dynamic Mediation [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
5/9/2023	Scheduling call for mediation with Dynamic	Heather Leonard	0.1
5/8/2023	namic Security Post-trial motions and Rule 408 discussion on request for injunctive relief [IWOV-WSACTIV	Heather Leonard	0.1
5/8/2023	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Order on Motion for Extension of	Heather Leonard	0.1
5/6/2023	2 emails sent/reviewed regarding Case	Heather Leonard	0.1
5/6/2023	amic Security Post-trial motions and Rule 408 discussion on request for injunctive relief [IWOV-WSACTIV	Heather Leonard	0.1
5/3/2023	namic Security Post-trial motions and Rule 408 discussion on request for injunctive relief [IWOV-WSACTIV	Heather Leonard	0.3

5/3/2023	1 email sent/reviewed regarding Jennifer wheeler	Heather Leonard	0.1
5/1/2023	1 email sent/reviewed regarding Thanks and quick question	Heather Leonard	0.1
4/27/2023	2 emails sent/reviewed regarding Trial Help Please!	Heather Leonard	0.2
4/27/2023	Defendant Dynamic Security, Inc.'s Motion for Renewed Judgment as a Matter of Law as to Liability and I	Heather Leonard	1.3
4/27/2023	Review Doc. 197 - Renewed motion for judgment as a matter of law	Heather Leonard	1
4/27/2023	ng Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Motion for Judgment as a Matter	Heather Leonard	0.1
4/27/2023	Email attachment reviewed - PL - Obj to Dynamic Exhibit List	Heather Leonard	0.3
4/26/2023	2 emails sent/reviewed regarding Case	Heather Leonard	0.1
4/26/2023	iewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Transcript	Heather Leonard	0.1
4/26/2023	1 email sent/reviewed regarding Law360 request for comment	Heather Leonard	0.1
4/25/2023	nt/reviewed regarding Key v Dynamic - Motion for Equitable Relief and Damages Calculation	Heather Leonard	0.1
4/25/2023	5 emails sent/reviewed regarding Big Congratulations!	Heather Leonard	0.1
4/24/2023	1 email sent/reviewed regarding Key - equitable relief motion	Heather Leonard	0.1
4/24/2023	PL - Motion for Equitable Relief created, then edited	Heather Leonard	0.6
4/24/2023	PL Obj to Proposed Jury Instructions reviewed	Heather Leonard	0.1
4/24/2023	Itemization of Copies reviewed	Heather Leonard	0.1
4/24/2023	Motion for Attorney's Fees edited	Heather Leonard	1.4
4/24/2023	Bill of Costs reviewed	Heather Leonard	0.1
4/24/2023	2 emails sent/reviewed regarding Big Congratulations!	Heather Leonard	0.1
4/19/2023	3 emails sent/reviewed regarding Davita Key	Heather Leonard	0.1
4/18/2023	ynamic Security Post-trial motions and Rule 408 discussion on request for injunctive relief [IWOV-WSACTI]	Heather Leonard	0.1
4/18/2023	il sent/reviewed regarding Key- draft fee petition and fee dects for Candis, Sonya, and Kira	Heather Leonard	0.1
4/18/2023	1 email sent/reviewed regarding Scan from Home Office	Heather Leonard	0.1
4/18/2023	1 email sent/reviewed regarding Davita Key	Heather Leonard	0.1
4/18/2023	Esquire 2022.08.29 Re paying bill for plaintiff depo reviewed	Heather Leonard	0.1
4/18/2023	2 emails sent/reviewed regarding Key - Bill of Costs - transcripts	Heather Leonard	0.1
4/17/2023	Itemization of Deposition Transcripts and Copies created, then edited	Heather Leonard	0.2
4/17/2023	LEONARD_71304 reviewed	Heather Leonard	0.1
4/17/2023	Key - Time and Fees for Fee Petition reviewed	Heather Leonard	0.1
4/17/2023	1 email sent/reviewed regarding Key - Bill of Costs - transcripts	Heather Leonard	0.1
4/17/2023	1 email sent/reviewed regarding Key - Bill of costs (draft	Heather Leonard	0.1
4/17/2023	il sent/reviewed regarding Key- draft fee petition and fee dects for Candis, Sonya, and Kira	Heather Leonard	0.1
4/17/2023	Motion for Attorney's Fees created, then edited	Heather Leonard	0.7

4/17/2023	Bill of Costs created, then edited	Heather Leonard	0.5
4/17/2023	2023_03_3 - CLH Investigations - Cureton Svc - \$200.00 reviewed	Heather Leonard	0.1
4/17/2023	Key - Time and Fees for Fee Petition created	Heather Leonard	0.1
4/17/2023	Itemization of Copies created	Heather Leonard	0.1
4/17/2023	3 sent/reviewed regarding Key- Bill of Costs - corrected chart to complete for depo invoices	Heather Leonard	0.2
4/12/2023	email sent/reviewed regarding Message For (7865749161:11116938) 2023-04-12 10:01AM	Heather Leonard	0.1
4/12/2023	3 emails sent/reviewed regarding Call from al.com to interview Davita Key	Heather Leonard	0.1
4/3/2023	1 email sent/reviewed regarding Dynamic Verdict	Heather Leonard	0.1
4/3/2023	1 email sent/reviewed regarding Sharefile - Dynamic / Key	Heather Leonard	0.1
4/3/2023	1981 Retaliation Verdict in the US District Court for the Middle District of Alabama before Chief Judge Em	Heather Leonard	0.1
4/3/2023	5 emails sent/reviewed regarding Open Forum Digest for Thursday March 30, 2023	Heather Leonard	0.2
4/3/2023	Please pay process server for Cureton Service in Key (and scan and save the check to the billing folder in s	Heather Leonard	0.1
3/31/2023	2 emails sent/reviewed regarding Open Forum Digest for Thursday March 30, 2023	Heather Leonard	0.4
3/30/2023	1981 Retaliation Verdict in the US District Court for the Middle District of Alabama before Chief Judge Em	Heather Leonard	0.1
3/30/2023	1981 Retaliation Verdict in the US District Court for the Middle District of Alabama before Chief Judge Em	Heather Leonard	0.1
3/30/2023	1 email sent/reviewed regarding Retaliation jury charges	Heather Leonard	0.1
3/30/2023	email sent/reviewed regarding [NELA-AL] : Middle District Retaliation Verdict - Judge Marks	Heather Leonard	0.1
3/30/2023	1981 Retaliation Verdict in the US District Court for the Middle District of Alabama before Chief Judge Em	Heather Leonard	0.1
3/30/2023	iewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Jury Verdict	Heather Leonard	0.1
3/30/2023	regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Jury Trial - Completed	Heather Leonard	0.1
3/30/2023	2 emails sent/reviewed regarding CONGRATS!!	Heather Leonard	0.1
3/29/2023	:tivity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Order on Motion for Judgment as a T	Heather Leonard	0.1
3/29/2023	Trial	Heather Leonard	8
3/29/2023	Work on powerpoint for opening argument	Heather Leonard	1.2
3/29/2023	mails sent/reviewed regarding Key v Dynamic Security - final version of Robinson Depo	Heather Leonard	0.2
3/29/2023	PL - Additional proposed jury charge reviewed	Heather Leonard	0.2
3/29/2023	PL - Jury Charges - filed 2023.02.24 reviewed	Heather Leonard	0.3
3/28/2023	Riddle Outline reviewed	Heather Leonard	0.8
3/28/2023	egarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Order on Motion in Limin	Heather Leonard	0.1
3/28/2023	ig Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Motion for Judgment as a Matter	Heather Leonard	0.1
3/28/2023	Def - Dynamic Response to RFA, RPD, and Interrogatories reviewed	Heather Leonard	0.2
3/28/2023	garding Your Sunday, Mar 26, 2023 - Monday, Mar 27, 2023 Stay at SpringHill Suites Montgomery Downtov	Heather Leonard	0.1
3/28/2023	2 emails sent/reviewed regarding Robinson video clips	Heather Leonard	0.1

3/28/2023	PL - Additional proposed jury charge edited	Heather Leonard	0.4
3/28/2023	Trial	Heather Leonard	8
3/28/2023	mail sent/reviewed regarding 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc.	Heather Leonard	0.1
3/28/2023	1 email sent/reviewed regarding Spires	Heather Leonard	0.5
3/27/2023	1 email sent/reviewed regarding Notes on potential jurors	Heather Leonard	0.1
3/27/2023	Riddle Outline created, then edited	Heather Leonard	1
3/27/2023	PL - Additional proposed jury charge created, then edited and reviewed	Heather Leonard	0.4
3/27/2023	Doc. 162 - PL Objection to re Def Proposed Voir Dire reviewed	Heather Leonard	0.1
3/27/2023	Doc. 126 - Objection to re [105] Exhibit List filed by Davita M. Key. reviewed	Heather Leonard	0.2
3/27/2023	mail sent/reviewed regarding Key v Dynamic Security - final version of Robinson Depo	Heather Leonard	0.1
3/27/2023	al (Courtroom 2A Frank M. Johnson Federal Courthouse (Montgomery, AL)) attended	Heather Leonard	8
3/27/2023	Juror Notes - Day of Trial - 3.27.23 created, then edited	Heather Leonard	0.8
3/27/2023	'reviewed regarding 2:91-cv-767-ECM-SMD - Key v Dynamic Robinson Deposition Designations	Heather Leonard	0.1
3/27/2023	attachment reviewed - Robinson - to present to jury - final after court ruling on objections	Heather Leonard	0.1
3/27/2023	Spires Outline created, then edited	Heather Leonard	1.4
3/27/2023	3 emails sent/reviewed regarding Cureton Witness Information	Heather Leonard	0.1
3/27/2023	4 emails sent/reviewed regarding Jury	Heather Leonard	0.1
3/27/2023	1 email sent/reviewed regarding Robinson Final to present to jury	Heather Leonard	0.1
3/27/2023	19cv767-ECM Plaintiff's Exhibit List reviewed	Heather Leonard	0.1
3/27/2023	mails sent/reviewed regarding 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc.	Heather Leonard	0.1
3/27/2023	emails sent/reviewed regarding 2022-08-30 Ray Cureton Synced Video Deposition	Heather Leonard	0.1
3/27/2023	email sent/reviewed regarding Corrected DX 18 [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
3/27/2023	1 email sent/reviewed regarding Final Jury	Heather Leonard	0.1
3/27/2023	82 MSJ Opposition Brief reviewed	Heather Leonard	0.1
3/27/2023	D Ex. 18 - Letter from PL dated 10-4-2017 to AL DOL created	Heather Leonard	0.1
3/27/2023	Px 13- hmma notice of RTS reviewed	Heather Leonard	0.1
3/27/2023	Final Jury created, then edited	Heather Leonard	0.2
3/26/2023	mail sent/reviewed regarding Key v Dynamic - jury verdict form I prepared for your review	Heather Leonard	0.1
3/26/2023	PL - Supplemental Depo Designations created, then edited	Heather Leonard	0.3
3/26/2023	1 email sent/reviewed regarding Case	Heather Leonard	0.2
3/26/2023	g Davita M. Key v. Hyundai Motor Manufacturing Alabama, LLC, et al., - Transcript for Gloria Robinson (3/2	Heather Leonard	0.1
3/26/2023	1 email sent/reviewed regarding Robinson designations	Heather Leonard	0.1
3/26/2023	PL - Verdict Form created, then edited	Heather Leonard	0.2

3/26/2023	19cv767-ECM Plaintiff's Exhibit List reviewed	Heather Leonard	0.1
3/26/2023	il sent/reviewed regarding Gloria Robinson transcript [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
3/26/2023	ails sent/reviewed regarding Key v Dynamic - Heather's notes on juror questionnaires	Heather Leonard	0.1
3/26/2023	Juror Notes - Pretrial edited and reviewed	Heather Leonard	1.9
3/25/2023	Binder1 - Jury Profiles w bookmarks reviewed	Heather Leonard	0.1
3/25/2023	Review Juror Profiles	Heather Leonard	4.1
3/25/2023	Juror Notes - Pretrial created, then edited	Heather Leonard	3.5
3/25/2023	Meeting with client to prepare her direct exam	Heather Leonard	1.6
3/24/2023	Comparison of Exhibit Lists - 3.21.23 reviewed	Heather Leonard	0.2
3/24/2023	Review Doc. 178 - Pretrial Order	Heather Leonard	0.1
3/24/2023	ent/reviewed regarding Key v Dynamic Security - opening [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
3/24/2023	ties' counsel to discuss admission of exhibits in advance of trial (Microsoft Teams Meeting) attended	Heather Leonard	0.5
3/23/2023	1 email sent/reviewed regarding Dynamic/Key: Defendants exhibit list and exhibits.	Heather Leonard	0.1
3/23/2023	ent/reviewed regarding Key v Dynamic - trial subpoenas [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
3/23/2023	1 email sent/reviewed regarding Dynamic/Key: Defendants exhibit list and exhibits.	Heather Leonard	0.1
3/23/2023	82 MSJ Opposition Brief reviewed	Heather Leonard	0.1
3/23/2023	1 email sent/reviewed regarding Dynamic/Key: Defendants exhibit list and exhibits.	Heather Leonard	0.1
3/23/2023	ewed regarding Key v Dynamic Security - Plaintiff's Trial Exhibits [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.3
3/23/2023	1 email sent/reviewed regarding Key v Dynamic Security - opening	Heather Leonard	0.1
3/23/2023	Pick up juror profiles in Key (One Church Street; Montgomery, AL 36104) attended	Heather Leonard	0.5
3/23/2023	1 email sent/reviewed regarding Dynamic/Key: Defendants exhibit list and exhibits.	Heather Leonard	0.1
3/23/2023	1 email sent/reviewed regarding Dynamic/Key: Defendants exhibit list and exhibits.	Heather Leonard	0.1
3/23/2023	1 email sent/reviewed regarding Dynamic/Key: Defendants exhibit list and exhibits.	Heather Leonard	0.1
3/23/2023	1 email sent/reviewed regarding Dynamic/Key: Defendants exhibit list and exhibits.	Heather Leonard	0.1
3/23/2023	1 email sent/reviewed regarding Dynamic/Key: Defendants exhibit list and exhibits.	Heather Leonard	0.1
3/22/2023	Work on PowerPoint for opening statement	Heather Leonard	2.8
3/22/2023	Exhibit Notebook Cover Page created, then reviewed	Heather Leonard	0.3
3/21/2023	nt/reviewed regarding Key v Dynamic Security - px 17- dynamic security officer's handbook.pdf	Heather Leonard	0.2
3/21/2023	Pretrial Order - 2023.02.23 reviewed	Heather Leonard	0.2
3/21/2023	Please pay process server for Cureton Service in Key (and scan and save the check to the billing folder in s	Heather Leonard	0.1
3/21/2023	it List Defendant Dynamic Security, Inc.'s Amended Exhibit List by Dynamic Security, Inc. reviewed	Heather Leonard	0.1
3/21/2023	px 30 - plaintiff's job application_redacted created	Heather Leonard	0.1
3/21/2023	Dx 41- PL application for employment reviewed	Heather Leonard	0.1

3/21/2023	2 emails sent/reviewed regarding Cureton Witness Information	Heather Leonard	0.1
3/21/2023	1 email sent/reviewed regarding Key - Staples copy job	Heather Leonard	0.1
3/21/2023	Cureton ROS created	Heather Leonard	0.1
3/21/2023	px 17- dynamic security officer's handbook created	Heather Leonard	0.1
3/21/2023	Comparison of Exhibit Lists - 3.21.23 created, then edited and reviewed	Heather Leonard	0.6
3/21/2023	7 emails sent/reviewed regarding Subpoena to Serve in Montgomery	Heather Leonard	0.1
3/21/2023	Px 14- August 30, 2017 Email from Cureton to Spires created	Heather Leonard	0.2
3/21/2023	1 email sent/reviewed regarding Key v Dynamic - updated exhibit list comparison	Heather Leonard	0.1
3/21/2023	1 email sent/reviewed regarding Key v Dynamic Security - Plaintiff's Trial Exhibits	Heather Leonard	0.2
3/21/2023	2 messages sent/reviewed	Heather Leonard	0.1
3/21/2023	19cv767-ECM Plaintiff's Exhibit List edited and reviewed	Heather Leonard	0.2
3/21/2023	Memo created - Cureton Contact Info	Heather Leonard	0.1
3/21/2023	Px 17- Dynamic Security Officer's Handbook created	Heather Leonard	0.2
3/21/2023	px 16- dynamic security paycheck_Redacted created	Heather Leonard	0.1
3/20/2023	?x 35- email 8.29.17 Spires, Cureton and other re unemployment rebuttal reviewed	Heather Leonard	0.1
3/20/2023	Px 40- Dynamic discipline guidelines reviewed	Heather Leonard	0.1
3/20/2023	Px 13 - August 29, 2017 Email from Spires to Cureton and Riddle created	Heather Leonard	0.1
3/20/2023	Px 23 - EEOC Charge_Redacted created	Heather Leonard	0.1
3/20/2023	26- email 8.1.17 between Cureton, Spires and others re reason for removal reviewed	Heather Leonard	0.1
3/20/2023	Px 5- August 7, 2017 Email from Cureton to Spires_Redacted created	Heather Leonard	0.1
3/20/2023	Px 43- email 8.1.17 Cureton to Dynamic re Key internal complaint reviewed	Heather Leonard	0.1
3/20/2023	Prep for depo - Gloria Robinson Trial Deposition Outline created, then edited	Heather Leonard	1.3
3/20/2023	Doc. 102 - PL Exhibit List reviewed	Heather Leonard	0.1
3/20/2023	Px 29- email Dynamic transmittal to HR with Complaint reviewed	Heather Leonard	0.1
3/20/2023	Px 51- Robinson employment discipline and complaints reviewed	Heather Leonard	0.1
3/20/2023	Leslie's trial exhibit list reviewed	Heather Leonard	0.1
3/20/2023	Px 32- email 8.11.17 Spires, Cureton and others re EEOC response reviewed	Heather Leonard	0.1
3/20/2023	5- email 8.7.17 between Cureton, Spires and other notifying of threats to sue reviewed	Heather Leonard	0.1
3/20/2023	3- email 8.11.17 Spire, Cureton and others concerning work verification of Key reviewed	Heather Leonard	0.1
3/20/2023	email sent/reviewed regarding Key v Dynamic - Exhibit List Chart for the Court for trial	Heather Leonard	0.1
3/20/2023	'x 44- email 8.29.17 bt Cureton, Spires and others re Key complaint status reviewed	Heather Leonard	0.1
3/20/2023	2 messages sent/reviewed	Heather Leonard	0.1
3/20/2023	Px 39- Dynamic rules and regulations reviewed	Heather Leonard	0.1

3/20/2023	Px 24- Latunya Howell statement reviewed	Heather Leonard	0.1
3/20/2023	Deposition of Gloria Robinson	Heather Leonard	2
3/20/2023	Px 15- 09-10 2017 email bt Robinson, Baxter, Williams re styled hair reviewed	Heather Leonard	0.1
3/20/2023	3 emails sent/reviewed regarding Nicolle Scavella and Rule 408 Discussion	Heather Leonard	0.4
3/20/2023	1 email sent/reviewed regarding Key v Dynamice - updated/corrected exhibit list	Heather Leonard	0.1
3/20/2023	19cv767-ECM Plaintiff's Exhibit List edited	Heather Leonard	2.2
3/20/2023	Px 41- Dynamic harassment policy reviewed	Heather Leonard	0.1
3/20/2023	Px 16- email 8-2-17 bt Cureton, Robinson, others saying Key not to return reviewed	Heather Leonard	0.1
3/20/2023	x 20- email 8.8.17 email bt Cureton, Spires and others with Key complaint reviewed	Heather Leonard	0.1
3/20/2023	Px 19- Dynamic statements re Key 8.14.17 reviewed	Heather Leonard	0.1
3/20/2023	Px 26 - Job Search Emails created	Heather Leonard	0.1
3/20/2023	Px 11- email bt Robinson and Key re interview time reviewed	Heather Leonard	0.1
3/20/2023	Px 27- email 8.1.17 Cureton Williams and others reviewed	Heather Leonard	0.1
3/20/2023	Px 5- App Standards for security personnel reviewed	Heather Leonard	0.1
3/20/2023	Px 34- email 8.22.17 Spires, Cureton and others re unemployment reviewed	Heather Leonard	0.1
3/20/2023	COSTS by Hyundai Engineering America, Inc., Hyundai Motor Manufacturing Alabama, LLC. reviewed	Heather Leonard	0.1
3/19/2023	3 emails sent/reviewed regarding Subpoena to Serve in Montgomery	Heather Leonard	0.1
3/19/2023	mail sent/reviewed regarding 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc.	Heather Leonard	0.1
3/19/2023	1 email sent/reviewed regarding Davita outline	Heather Leonard	0.1
3/19/2023	1 email sent/reviewed regarding Key v Dynamic Security - possible plaintiff prep	Heather Leonard	0.1
3/19/2023	1 email sent/reviewed regarding Dynamic - Key [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
3/16/2023	Review Doc. 175 - Notice of Availability of Juror Profiles	Heather Leonard	0.1
3/16/2023	Dynamic - Key - Initial Disclosures - 000001 - 000038 reviewed	Heather Leonard	0.1
3/16/2023	Key v. Dynamic - Attorney Trial Prep Meeting 2 (Microsoft Teams Meeting) attended	Heather Leonard	1.5
3/16/2023	Doc. 175 - Notice of Availability of Juror Profiles reviewed	Heather Leonard	0.1
3/16/2023	Subpoena to Kristal Riddle edited	Heather Leonard	0.1
3/16/2023	Doc. 102 - PL Exhibit List reviewed	Heather Leonard	0.3
3/16/2023	Subpoena to Sherry Spires edited	Heather Leonard	0.1
3/16/2023	1 email sent/reviewed regarding Dynamic - Key	Heather Leonard	0.1
3/16/2023	Letter to Ford Harrison, LLP re trial subpoenas created, then edited and reviewed	Heather Leonard	0.3
3/16/2023	mail sent/reviewed regarding 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc.	Heather Leonard	0.1
3/16/2023	Exhibit List for Court created, then edited and reviewed	Heather Leonard	2.9
3/16/2023	1 email sent/reviewed regarding Key v Dynamic Security - Trial Subpoens	Heather Leonard	0.1

3/15/2023	6 emails sent/reviewed regarding Subpoena to Serve in Montgomery	Heather Leonard	0.2
3/15/2023	Meeting with client to prepare her trial testimony	Heather Leonard	2
3/15/2023	Subpoena to Ray Cureton edited	Heather Leonard	0.1
3/15/2023	1 email sent/reviewed regarding Hotel Room for Key	Heather Leonard	0.1
3/15/2023	ewed regarding Reservation Confirmation #98472778 for SpringHill Suites Montgomery Downtown	Heather Leonard	0.2
3/15/2023	Key Plaintiff Prep Meeting One (Microsoft Teams Meeting) attended	Heather Leonard	2.3
3/15/2023	sent/reviewed regarding Please prepare these two witness fee checks and bring to Heather	Heather Leonard	0.1
3/15/2023	Witness re trial subpoena - process server letter - Ray Cureton created, then edited	Heather Leonard	0.1
3/15/2023	Subpoena to Sherry Spires reviewed	Heather Leonard	0.1
3/15/2023	Letter to Charlotte Henderson re service of process created, then edited	Heather Leonard	0.2
3/15/2023	efendant Dynamic Security, Inc.'s Witness List (unredacted) - 01-26-2023 reviewed	Heather Leonard	0.1
3/14/2023	4 emails sent/reviewed regarding Dynamic - Key	Heather Leonard	0.1
3/14/2023	ding Dynamic - Key - Letter to Palmer Leonard re Trial Subp. EM 03-14-2023 [IWOV-WSACTIVELLP.FID199]	Heather Leonard	0.3
3/14/2023	il sent/reviewed regarding Notices of Trial Deposition [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
3/13/2023	Subpoena to Ray Cureton edited	Heather Leonard	0.2
3/13/2023	Witness Fee Checks created, then edited and reviewed	Heather Leonard	0.3
3/13/2023	Witness re trial subpoena - Ray Cureton created	Heather Leonard	0.1
3/8/2023	Doc. 174 - Order Denying Interlocutory Appeal	Heather Leonard	0.1
3/8/2023	ONSE in Opposition re [158] Third MOTION in Limine Defendant Dynamic Security, Inc.'s reviewed	Heather Leonard	0.1
3/8/2023	PONSE in Opposition re [160] Fifth MOTION in Limine Defendant's Fifth Motion In Limine reviewed	Heather Leonard	0.1
3/8/2023	ding Key v Dynamic - trial subpoenas and Rule 408 settlement discussions [IWOV-WSACTIVELLP.FID199]	Heather Leonard	0.2
3/8/2023	Review Doc. 166 - Dynamic's response to PL 2nd MIL - Dismissed Claims	Heather Leonard	0.2
3/8/2023	Key Attorney Trial Prep Meeting #1 (Microsoft Teams Meeting) attended	Heather Leonard	1.8
3/8/2023	ONSE in Opposition re [159] Fourth MOTION in Limine Defendant Dynamic Security, Inc.'s reviewed	Heather Leonard	0.1
3/8/2023	PONSE in Opposition re [157] Second MOTION in Limine Defendant Dynamic Security, reviewed	Heather Leonard	0.1
3/8/2023	ent/reviewed regarding Key v Dynamic - trial subpoenas [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
3/8/2023	Review Doc. 167 - Dynamic crponse to PL 3rd MIL - EEOC Determination	Heather Leonard	0.1
3/8/2023	e [156] First MOTION in Limine Defendant Dynamic Security, Inc.'s First Motion In Limine to Exclude Plain	Heather Leonard	0.1
3/8/2023	Review Doc. 168 - Dynamic Response to PL 4th MIL - DOL Finding	Heather Leonard	0.1
3/8/2023	Review Doc. 165 - Dynamic's Response to PL 1st MIL - Cureton as a Minister	Heather Leonard	0.1
3/7/2023	Review Doc. 164 - Motion to Certify Interlocutory Appeal	Heather Leonard	0.2
3/7/2023	4 emails sent/reviewed regarding KEY - Draft resp to 1st mil	Heather Leonard	0.2
3/7/2023	Second MOTION in Limine Defendant Dynamic Security, Inc.'s Second Motion in Limine reviewed	Heather Leonard	0.1

3/7/2023	Doc. 28 - Amended Complaint reviewed	Heather Leonard	0.1
3/7/2023	Email attachment reviewed -PL Resp- 1st MIL Koreans	Heather Leonard	0.1
3/7/2023	3 internal messages sent/reviewed	Heather Leonard	0.1
3/7/2023	PL Obj to Proposed Jury Instructions reviewed	Heather Leonard	0.1
3/7/2023	2 emails sent/reviewed regarding Key - Obj to Jury Instruction	Heather Leonard	0.2
3/7/2023	Doc. 75-27 - Deposition Transcript of Dynamic - Spires reviewed	Heather Leonard	0.1
3/7/2023	Response to Motion in Limine - Second created, then edited and reviewed	Heather Leonard	1.5
3/7/2023	Px 19- Dynamic position statement reviewed	Heather Leonard	0.1
3/6/2023	ding Key v Dynamic - trial subpoenas and Rule 408 settlement discussions [IWOV-WSACTIVELLP.FID199]	Heather Leonard	0.1
3/6/2023	PL - 2nd MIL - Dismissed Claims reviewed	Heather Leonard	0.1
3/1/2023	Subsequent Employment Chart created, then edited	Heather Leonard	0.1
3/1/2023	sent/reviewed regarding Key v Dynamic - trial subpoenas [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
3/1/2023	emails sent/reviewed regarding Key v Dynamic Security - settlement communicaiton	Heather Leonard	0.1
3/1/2023	PL - Obj to Def Dynamic Voir Dire created, then edited and reviewed	Heather Leonard	1.6
3/1/2023	PL - Obj to Def Dynamic Voir Dire created	Heather Leonard	0.1
3/1/2023	1 email sent/reviewed regarding Key v Dynamic - trial subpoenas	Heather Leonard	0.1
3/1/2023	Trial Prep Checklist created, then edited	Heather Leonard	0.5
3/1/2023	2 emails sent/reviewed regarding Key v Dynamic - trial prep checklist	Heather Leonard	0.1
3/1/2023	Trial Preparation Meeting with Leslie view and culling of exhibits for trial and prepa	Heather Leonard	5.5
3/1/2023	1 email sent/reviewed regarding Case Information	Heather Leonard	0.1
3/1/2023	Damages Worksheet for Client to Fill Out created	Heather Leonard	0.1
3/1/2023	Doc. 154 - Proposed Voir Dire by Davita M. Key reviewed	Heather Leonard	0.1
3/1/2023	Doc. 155 - Defendant's Voir Dire reviewed	Heather Leonard	0.1
3/1/2023	iewed regarding Key v Dynamic - trial preparation on injuries (please return worksheets by March 8)	Heather Leonard	0.1
3/1/2023	regarding [NELA Open Forum] : Voir Dire Question Suggesting Discrimination against Union Membership	Heather Leonard	0.1
3/1/2023	ved regarding Key v Dynamic Security - settlement communicaiton [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
3/1/2023	4 emails sent/reviewed regarding Signed Copy	Heather Leonard	0.1
2/28/2023	Review Doc. 155 - Defendant's Voir Dire	Heather Leonard	0.1
2/28/2023	emails sent/reviewed regarding Key v Dynamic - trial subpoena for Carolyn Williams	Heather Leonard	0.1
2/27/2023	PL - Obj to HMMA Witness and Exhibit List reviewed	Heather Leonard	0.1
2/27/2023	6 emails sent/reviewed regarding Jennifer wheeler	Heather Leonard	0.2
2/27/2023	PL - Obj to HMMA Depositon Designations reviewed	Heather Leonard	0.1
2/24/2023	PL - Jury Charges - filed 2023.02.24 created	Heather Leonard	0.1

2/24/2023	Dx 61- 7.27.16 letter of extension of contract reviewed	Heather Leonard	0.1
2/24/2023	1 email sent/reviewed regarding Key - MIL Cureton Preacher Man	Heather Leonard	0.1
2/24/2023	iewed regarding 2:19-cv-767-ECM-SMD; Key v Dynamic Security - Plaintiff's Proposed Jury Charges	Heather Leonard	0.1
2/24/2023	PL - Proposed Voir Dire created, then edited	Heather Leonard	0.5
2/24/2023	3 emails sent/reviewed regarding Key v Dynamic - 1st MIL - Cureton as minister	Heather Leonard	0.1
2/24/2023	1 email sent/reviewed regarding Proposed voir dire	Heather Leonard	0.1
2/24/2023	PL - 4th MIL - Unemployment Determination created, then edited	Heather Leonard	0.3
2/24/2023	egarding Key v Dynamic - Plaintiff's Second Motion in Limine - Dismissed Claims (for your review, revision)	Heather Leonard	0.1
2/24/2023	1 email sent/reviewed regarding Key v Dynamic - 4th MIL on Unemployment Finding	Heather Leonard	0.1
2/24/2023	PL - Jury Charges - filed 2023.02.24 created, then edited and reviewed	Heather Leonard	0.2
2/24/2023	PL - 3rd MIL - EEOC Finding created, then edited and reviewed	Heather Leonard	0.4
2/24/2023	2 emails sent/reviewed regarding Key v Dynamic - draft jury charges for your review	Heather Leonard	0.1
2/24/2023	1 email sent/reviewed regarding Key v Dynamic Security - Third MIL - EEOC Finding	Heather Leonard	0.1
2/24/2023	PL - 2nd MIL - Dismissed Claims created, then edited	Heather Leonard	0.3
2/24/2023	PL MIL Cureton Preacher - HL Review created, then edited	Heather Leonard	0.3
2/23/2023	sent/reviewed regarding 2:19-cv-00767-ECM-SMD - Key v Dynamic - Revised Pretrial Order	Heather Leonard	0.1
2/23/2023	emails sent/reviewed regarding Key v Dynamic - trial subpoena for Carolyn Williams	Heather Leonard	0.1
2/23/2023	ing Key v Dynamic Security - framing of decision to remove Key from Hyundai [IWOV-WSACTIVE LLP.FID19	Heather Leonard	0.5
2/23/2023	ent/reviewed regarding Pretrial Order - 2023.02.22 (003) [IWOV-WSACTIVE LLP.FID1997338]	Heather Leonard	0.2
2/23/2023	3 emails sent/reviewed regarding Key v Dynamic Security - revised pretrial order	Heather Leonard	0.1
2/23/2023	1 email sent/reviewed regarding Key v Dynamic Trial - witness subpoenas	Heather Leonard	0.1
2/23/2023	1 email sent/reviewed regarding Key v Dynamic - draft jury charges for your review	Heather Leonard	0.1
2/23/2023	PL - Jury Charges created, then edited	Heather Leonard	2.5
2/23/2023	Pretrial Order - 2023.02.23 edited	Heather Leonard	0.3
2/23/2023	t/reviewed regarding Key v Dynamic Security - framing of decision to remove Key from Hyundai	Heather Leonard	0.1
2/22/2023	Pretrial Order - 2023.02.22 created, then edited	Heather Leonard	0.8
2/22/2023	1 email sent/reviewed regarding Key v Dynamic Security - revised pretrial order	Heather Leonard	0.1
2/22/2023	1 email sent/reviewed regarding Pattern Jury Instructions - Civil	Heather Leonard	0.2
2/22/2023	PL - Jury Charges created, then edited	Heather Leonard	0.3
2/22/2023	review Doc. 147 - Order on jury trial, extension, and reconsideration	Heather Leonard	0.1
2/21/2023	onference - review proposed pretrial order, briefs of jury trial issue, calendar for potential time conflicts	Heather Leonard	0.5
2/21/2023	Pretrial conference	Heather Leonard	1.3
2/17/2023	Doc. 138-MEMORANDUM OPINION AND ORDER it is ORDERED reviewed	Heather Leonard	0.5

2/16/2023	ORDERED that the [89] motion to strike Plf's jury demand is hereby SET for oral argument on 2.21.2023 re Review Doc. 138 - MSJ Opinion	Heather Leonard	0.1
2/16/2023	4 messages sent/reviewed	Heather Leonard	0.5
2/16/2023	emails sent/reviewed regarding Key v. Dynamic - Rest to depo designation objections	Heather Leonard	0.1
2/16/2023	PL Resp to Dynamic Depo Obj - HL Review created, then edited	Heather Leonard	0.4
2/16/2023	1 email sent/reviewed regarding Key v HMMA	Heather Leonard	0.2
2/13/2023	1 email sent/reviewed regarding Key - Options	Heather Leonard	0.1
2/10/2023	ewed regarding Key v HMMA et al - version 4 of the pretrial order [IWOV-WSACTIVE LLP.FID1997338]	Heather Leonard	0.1
2/10/2023	3 emails sent/reviewed regarding Key v HMMA et al - version 4 of the pretrial order	Heather Leonard	0.1
2/10/2023	Pretrial Order- 2023.02.10 - Version 5 created, then reviewed	Heather Leonard	0.3
2/10/2023	Email attachment reviewed - 757286	Heather Leonard	0.1
2/10/2023	Email attachment reviewed - Pretrial Order- 2023.02.10 - Version 5	Heather Leonard	0.1
2/10/2023	sent/reviewed regarding Key v HMMA, HEA, Dynamic (2:19-cv-767-ECM-SMD) - pretrial order	Heather Leonard	0.1
2/9/2023	ail sent/reviewed regarding HMMA - our objections to Key and Burns Depo Designations	Heather Leonard	0.1
2/9/2023	Doc. 68-2 -Exhibit 2 - Depo Transcript of R. Burns reviewed	Heather Leonard	0.1
2/9/2023	Review Doc. 132 - Dynamic's Obj to HMMA's Exhibit List	Heather Leonard	0.3
2/9/2023	PL - Obj to HMMA Witness and Exhibit List edited	Heather Leonard	0.1
2/9/2023	1 email sent/reviewed regarding key v hmma - comparison of exhibit lists	Heather Leonard	0.1
2/9/2023	PL - Obj to Dynamic Exhibit List edited and reviewed	Heather Leonard	0.1
2/9/2023	Review Doc. 129 - HEA Obj to PL Exhibit List	Heather Leonard	0.1
2/9/2023	Review Doc. 123 - HMMA Obj to Depo Designations	Heather Leonard	0.2
2/9/2023	Review Doc. 122 - HMMA Obj to PL Witness List	Heather Leonard	0.1
2/9/2023	1 email sent/reviewed regarding Key v HMMA et al - version 4 of the pretrial order	Heather Leonard	0.8
2/9/2023	Comparison of Exhibit Lists reviewed	Heather Leonard	0.1
2/9/2023	PL - Obj to HMMA Depositon Designations created, then edited and reviewed	Heather Leonard	2.1
2/9/2023	Review Doc. 131 - Dynamic's Obj to HEA Exhibit List	Heather Leonard	0.1
2/9/2023	82 MSJ Opposition Brief reviewed	Heather Leonard	0.4
2/9/2023	Review Doc. 133 - Dynamic's Obj to PL Exhibit List	Heather Leonard	0.3
2/9/2023	PL - Obj to HEA edited	Heather Leonard	0.2
2/9/2023	Review Doc. 130 - Dynamic's Obj to Depo Designations	Heather Leonard	0.3
2/9/2023	osition Designations (Responsive Designations of DepositionTrial Excerpts) by Hyundai reviewed	Heather Leonard	0.1
2/9/2023	PI Objection to HEA Depo Designations edited	Heather Leonard	0.1
2/9/2023	82 MSJ Opposition Brief reviewed	Heather Leonard	0.1

2/9/2023	Review Doc. 134 - Dynamic's Objections to Plaintiff's Witness List	Heather Leonard	0.1
2/9/2023	1 email sent/reviewed regarding Key - Exhibit list comparison	Heather Leonard	0.1
2/9/2023	Review Doc. 124 - HMMA Obj to Exhibit Lists	Heather Leonard	0.5
2/9/2023	2 emails sent/reviewed regarding HEA Depo Designation Response	Heather Leonard	0.2
2/9/2023	Review Doc. 128 - HEA Obj to PI Depo Designations	Heather Leonard	0.3
2/8/2023	viewed regarding Key v HMMA - objections to HEA Exhibit list for your review, revision, and filing	Heather Leonard	0.1
2/8/2023	Email attachment reviewed - PL - Obj to Dynamic Exhibit List	Heather Leonard	0.1
2/8/2023	Dx 2- 1st amended complaint reviewed	Heather Leonard	0.1
2/8/2023	PL - Obj to Dynamic Exhibit List edited	Heather Leonard	1.1
2/8/2023	ed regarding Key v HMMA, et al - Objections to Dynamic's exhibit list for your review, revision, and filing	Heather Leonard	0.6
2/8/2023	1 email sent/reviewed regarding Key - Exhibit list comparison	Heather Leonard	0.2
2/8/2023	L16 - Exhibit List (As Amended) by Hyundai Motor Manufacturing Alabama, LLC reviewed	Heather Leonard	0.1
2/8/2023	2 emails sent/reviewed regarding Key v HMMA - No. 42 on HMMA's exhibit list	Heather Leonard	0.1
2/8/2023	Doc. 68-2 -Exhibit 2 - Depo Transcript of R. Burns reviewed	Heather Leonard	0.1
2/8/2023	PL - Obj to HEA reviewed	Heather Leonard	0.1
2/8/2023	: Key v HMMA - REVISED AND UPDATED objections to HMMA witness/exhibit list for your review, revision, and filing	Heather Leonard	0.1
2/8/2023	Dx 33- individual employee schedule for Dixon reviewed	Heather Leonard	0.1
2/8/2023	1 email sent/reviewed regarding errata	Heather Leonard	0.1
2/8/2023	! regarding Key v HMMA - objections to HMMA witness and exhibit list for your review, revision, and filing	Heather Leonard	0.1
2/8/2023	PL - Obj to HMMA Witness and Exhibit List created, then edited	Heather Leonard	2.2
2/7/2023	Dx 15- ack of Dynamic officer manual reviewed	Heather Leonard	0.1
2/7/2023	it List Defendant Dynamic Security, Inc.'s Amended Exhibit List by Dynamic Security, Inc. reviewed	Heather Leonard	0.2
2/7/2023	Comparison of Exhibit Lists reviewed	Heather Leonard	0.1
2/7/2023	1 email sent/reviewed regarding Case	Heather Leonard	0.1
2/7/2023	1 email sent/reviewed regarding (no subject)	Heather Leonard	0.1
2/7/2023	tivity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Order to S	Heather Leonard	0.1
2/7/2023	3 emails sent/reviewed regarding Key v HMMA et al - version 4 of the pretrial order	Heather Leonard	0.1
2/7/2023	File - Defendant Hyundai ENG America, Inc.'s Motion for Leave to Amend its Trial Exhibit List by Hyundai E	Heather Leonard	0.1
2/7/2023	1 email sent/reviewed regarding Key - Exhibit list comparison	Heather Leonard	0.1
2/7/2023	Email attachment reviewed - PL - Obj to HEA	Heather Leonard	0.1
2/7/2023	reviewed regarding Key v HMMA - objections to HEA Exhibit list for your review, revision, and filing	Heather Leonard	0.2
2/7/2023	Dx 12- PL resp to Dynamic RFA created	Heather Leonard	0.1
2/7/2023	PL - Response to Show Cause - 2022.02.07 created, then edited	Heather Leonard	0.1

2/7/2023	Doc. 68-2 -Exhibit 2 - Depo Transcript of R. Burns reviewed	Heather Leonard	0.1
2/7/2023	1 email sent/reviewed regarding Key- exhibits I can't find	Heather Leonard	0.1
2/7/2023	Dx 7- Key Kelly services pay records created	Heather Leonard	0.1
2/7/2023	PL - Obj to HEA created, then edited	Heather Leonard	1.2
2/7/2023	Dx 24- letter of intent reviewed	Heather Leonard	0.1
2/7/2023	Doc. 102 - PL Exhibit List reviewed	Heather Leonard	0.1
2/7/2023	Dx 22- rebuttal from PL to eeoc re Dynamic position statement reviewed	Heather Leonard	0.1
2/7/2023	BurnsRobert062222-CT-LE reviewed	Heather Leonard	0.1
2/7/2023	PL - Obj to Dynamic Exhibit List created, then edited	Heather Leonard	1.4
2/3/2023	1 email sent/reviewed regarding Key v HMMA et al - version 4 of the pretrial order	Heather Leonard	0.1
2/3/2023	Review Doc. 108 - Order to Show Cause	Heather Leonard	0.1
2/3/2023	PL - Response to Show Cause created, then edited	Heather Leonard	0.1
2/3/2023	DN for Leave to File Amended Exhibit List by Hyundai Motor Manufacturing Alabama, LLC reviewed	Heather Leonard	0.1
2/2/2023	1 email sent/reviewed regarding Key- exhibits I can't find	Heather Leonard	0.1
2/1/2023	il sent/reviewed regarding Key v HMMA, HEA, Dynamic - leave to file amended exhibit list	Heather Leonard	0.1
2/1/2023	1 email sent/reviewed regarding Case	Heather Leonard	0.1
1/30/2023	2 emails sent/reviewed regarding Key- exhibits I can't find	Heather Leonard	0.3
1/30/2023	3 emails sent/reviewed regarding Case	Heather Leonard	0.1
1/30/2023	rding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al O	Heather Leonard	0.1
1/30/2023	t/reviewed regarding Key v. Hyundai Motor Manufacturing Alabama, LLC Amended Exhibit List	Heather Leonard	0.1
1/27/2023	Review Doc. 103 - Reply on Motion to Strike Jury Demand	Heather Leonard	0.3
1/27/2023	1 email sent/reviewed regarding Key, Davita - HMMA Trial Exhibits	Heather Leonard	0.1
1/27/2023	Review Doc. 99 - Dynamic Exhibit List	Heather Leonard	0.1
1/27/2023	1 email sent/reviewed regarding Key - Plaintiff's Trial Exhibits	Heather Leonard	0.1
1/27/2023	1 email sent/reviewed regarding Davita Key v. Dynamic Security, Inc.	Heather Leonard	0.1
1/27/2023	d regarding Key v HMMA, HEA, Dynamic 2:19-cv-00767-ECM-SMD - Plaintiff Witness List - Unredacted	Heather Leonard	0.1
1/27/2023	Review Doc. 94 - HMMA Deposition Designations	Heather Leonard	0.1
1/27/2023	3 emails sent/reviewed regarding D. Key v. HMMA, et al.	Heather Leonard	0.1
1/27/2023	1 email sent/reviewed regarding Key - Pretrial Documents	Heather Leonard	0.1
1/27/2023	REV Review - Doc. 96 - HEA Witness List	Heather Leonard	0.1
1/27/2023	Review Doc. 98 - Dynamic Witness List	Heather Leonard	0.1
1/27/2023	Review Doc. 95 - HMMA Exhibit List	Heather Leonard	0.1
1/27/2023	2 emails sent/reviewed regarding Key - Dynamic Trial Exhibits	Heather Leonard	0.2

1/27/2023	Comparison of Exhibit Lists created, then edited	Heather Leonard	1.1
1/27/2023	Review Doc. 97 - HEA Exhibit List	Heather Leonard	0.1
1/27/2023	Doc. 102 - PL Exhibit List reviewed	Heather Leonard	0.1
1/27/2023	Template - Subpoena to created, then edited	Heather Leonard	0.1
1/27/2023	Review Doc. 100 - Dynamic Depo Designation	Heather Leonard	0.1
1/27/2023	Review Doc. 104 - Motion to continue pretrial conference	Heather Leonard	0.1
1/27/2023	Review Doc. 93 - HMMA Witness List	Heather Leonard	0.1
1/27/2023	1 email sent/reviewed regarding Key, Davita - HEA Trial Exhibits	Heather Leonard	0.1
1/27/2023	ording Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al C	Heather Leonard	0.1
1/26/2023	Review Doc. 92 - Order moving pretrial conference	Heather Leonard	0.1
1/25/2023	ording Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al C	Heather Leonard	0.1
1/24/2023	Call among parties re: pretrial order	Heather Leonard	0.3
1/24/2023	with Allison Ingram re; March 27 trial setting (Pettaway v Montgomery/Finley is her case)	Heather Leonard	0.2
1/24/2023	ent/reviewed regarding Pettaway v Finley Trial Setting March 27 (Key v HMMA/HEA/Dynamic)	Heather Leonard	0.2
1/24/2023	nails sent/reviewed regarding Key v HMMA, HEA, Dynamic - pretrial order - version two	Heather Leonard	0.1
1/24/2023	1 email sent/reviewed regarding Key v HMMA, HEA, and Dynamic - pretrial order	Heather Leonard	0.1
1/24/2023	Pretrial Order- 2023.01.24 - Version 4 created, then edited	Heather Leonard	0.5
1/23/2023	mail sent/reviewed regarding Key v HMMA, HEA, Dynamic - pretrial order - version two	Heather Leonard	0.1
1/23/2023	1 email sent/reviewed regarding Key v HMMA, HEA, and Dynamic - pretrial order	Heather Leonard	0.1
1/23/2023	1 message sent/reviewed	Heather Leonard	0.1
1/23/2023	Pretrial Order- 2023.01.23 - Version 3 created, then edited and reviewed	Heather Leonard	1.7
1/19/2023	1 email sent/reviewed regarding KEY v HMMA, HEA and Dynamic Security	Heather Leonard	0.1
1/19/2023	Revised PTO by WRB reviewed	Heather Leonard	0.1
1/19/2023	Pretrial Order- 2023.01.19 - Version 2 created, then edited and reviewed	Heather Leonard	2.1
1/19/2023	Call with Matt Miller re pretrial order	Heather Leonard	0.1
1/19/2023	Response to Motion to Strike Due attended	Heather Leonard	4
1/19/2023	nails sent/reviewed regarding Key v HMMA, HEA, Dynamic - pretrial order - version two	Heather Leonard	0.3
1/19/2023	1 email sent/reviewed regarding Conference ID reservation""	Heather Leonard	0.1
1/18/2023	reviewed regarding KEY v HMMA, HEA and Dynamic Security [IWOV-WSACTIVE LLP.FID1997338]	Heather Leonard	0.1
1/18/2023	Response to Motion to Strike - HL Review created, then edited	Heather Leonard	1
1/18/2023	Def - Dynamic Response to RFA, RPD, and Interrogatories reviewed	Heather Leonard	0.1
1/18/2023	Handbook - MOTION to Strike Plaintiff's Demand for Jury Trial by Dynamic Security, Inc.. reviewed	Heather Leonard	0.1
1/18/2023	1 email sent/reviewed regarding KEY v HMMA, HEA and Dynamic Security	Heather Leonard	0.2

1/18/2023	email sent/reviewed regarding Key v HMMA Et al - Resp to Dynamic Jury Strike Motion 8044773 Davita.M Key DEFENDANT.EXHIBIT10 reviewed	Heather Leonard	0.1
1/18/2023	2 emails sent/reviewed regarding KEY v HMMA, HEA and Dynamic Security	Heather Leonard	0.1
1/12/2023	iewed regarding Key v HMMA - pretrial order - very rough draft 1 [IWOV-WSACTIVE LLP.FID1997338]	Heather Leonard	0.3
1/12/2023	3 emails sent/reviewed regarding Key v HMMA - sample witness list	Heather Leonard	0.1
1/10/2023	Draft and circulate pretrial order (Due 1/19)	Heather Leonard	2.5
1/9/2023	2 emails sent/reviewed regarding Case	Heather Leonard	0.3
1/9/2023	Pretrial Order - Judge Marks created, then edited	Heather Leonard	1
1/9/2023	82 MSJ Opposition Brief reviewed	Heather Leonard	0.1
1/9/2023	Review Doc. 90 - Show Cause on Motion to Strike Jury Demand	Heather Leonard	0.1
1/9/2023	1 internal message sent/reviewed	Heather Leonard	0.1
1/9/2023	1 email sent/reviewed regarding Key v HMMA - pretrial order - very rough draft 1	Heather Leonard	0.2
1/9/2023	rding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al O	Heather Leonard	0.1
1/5/2023	1 message sent/reviewed	Heather Leonard	0.1
1/2/2023	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Motion	Heather Leonard	0.1
12/1/2022	2 emails sent/reviewed regarding Case	Heather Leonard	0.2
11/16/2022	Doc. 88 - Dynamic motion to strike reviewed	Heather Leonard	0.2
11/15/2022	Review Doc. 87 Reply Brief	Heather Leonard	0.4
11/15/2022	Review Doc. 88 Motion to strike	Heather Leonard	0.1
11/14/2022	1 email sent/reviewed regarding HMMA Deposition of Robert Burns	Heather Leonard	0.3
11/11/2022	ID Key v. Hyundai Motor Manufacturing Alabama, LLC et al - Word version of Reply Brief of HMMA in Supp	Heather Leonard	0.1
11/11/2022	Doc. 85 - REPLY BRIEF in Response to Plaintiff's Brief filed by Hyundai reviewed	Heather Leonard	0.1
11/11/2022	19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Motion for Extension of T	Heather Leonard	0.1
11/11/2022	oc. 85 - BRIEFMEMORANDUM in Opposition re [68] Evidentiary Submission reviewed	Heather Leonard	0.6
11/11/2022	Review Doc. 86 - HEA's reply brief	Heather Leonard	0.2
11/11/2022	1 email sent/reviewed regarding HMMA Deposition of Robert Burns	Heather Leonard	0.1
11/11/2022	Review Doc 85 - HMMA's reply brief	Heather Leonard	0.4
11/11/2022	ing Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Rep	Heather Leonard	0.2
11/11/2022	Doc. 86 - REPLY BRIEF reviewed	Heather Leonard	0.1
11/11/2022	Hyundai Motor Manufacturing Alabama, LLC et al - Word version of Reply Brief of Hyundai ENG America, In	Heather Leonard	0.1
11/10/2022	Email attachment reviewed - MSJ RESPONSE V2 - Heather Pass	Heather Leonard	0.1
11/10/2022	1 email sent/reviewed regarding Key Brief so far	Heather Leonard	0.1
11/9/2022	Review Doc. 83 - Dynamic's motion for an extension to respond to SJ	Heather Leonard	0.1

11/4/2022	1 message sent/reviewed	Heather Leonard	0.1
11/3/2022	Dynamic - Key - Production - 000049-000092 reviewed	Heather Leonard	0.1
11/3/2022	Ex 47 - Mailroom Pay Issues reviewed	Heather Leonard	0.1
11/3/2022	Doc. 70 - MSJ Brief for HEA reviewed	Heather Leonard	0.1
11/3/2022	Ex 11 - HEA Pstn Sment HEA 53-56 reviewed	Heather Leonard	0.1
11/3/2022	Doc. 67- MSJ Brief by HMMA reviewed	Heather Leonard	0.1
11/3/2022	8044773 Davita.M Key DEFENDANT.EXHIBIT9 reviewed	Heather Leonard	0.1
11/3/2022	Ex 50 Scavella reviewed	Heather Leonard	0.1
11/3/2022	Ex 14 - EEOC Position Statement reviewed	Heather Leonard	0.1
11/3/2022	Exhibit 39 reviewed	Heather Leonard	0.1
11/3/2022	1 email sent/reviewed regarding conclusion	Heather Leonard	0.1
11/3/2022	Ex 58 Dynamic Unverified discovery Responses reviewed	Heather Leonard	0.1
11/3/2022	Ex 22 Charge Email reviewed	Heather Leonard	0.1
11/3/2022	Work on MSJ Response Brief	Heather Leonard	9.5
11/3/2022	Ex 23 Cause Email reviewed	Heather Leonard	0.1
11/3/2022	Key 001049-001050 Email reviewed	Heather Leonard	0.1
11/3/2022	Ex 16 - Response to Finding reviewed	Heather Leonard	0.1
11/3/2022	Williams PX-66 reviewed	Heather Leonard	0.1
11/3/2022	Exhibit 36 reviewed	Heather Leonard	0.1
11/3/2022	MSJ Response - Evidentiary Materials created, then edited	Heather Leonard	1.3
11/3/2022	Ex 20 Mailroom Job Duties reviewed	Heather Leonard	0.1
11/3/2022	Exhibit 38 reviewed	Heather Leonard	0.1
11/3/2022	Ex 12 - Notice of Charge reviewed	Heather Leonard	0.2
11/3/2022	8044773 Davita.M Key DEFENDANT.EXHIBIT12 reviewed	Heather Leonard	0.1
11/3/2022	Conclusion for SJ created, then edited	Heather Leonard	0.6
11/2/2022	BurnsRobert062222-LE reviewed	Heather Leonard	0.4
11/2/2022	Doc. 68-14 - Exhibit 13 - Declaration of C. Williams reviewed	Heather Leonard	0.1
11/2/2022	Exhibit 36 reviewed	Heather Leonard	0.1
11/2/2022	1 email sent/reviewed regarding Draft Declaration - DO NOT SIGN JUST REVIEW	Heather Leonard	0.1
11/2/2022	1 email sent/reviewed regarding Key Brief so far	Heather Leonard	0.1
11/2/2022	Williams PX-61 reviewed	Heather Leonard	0.1
11/2/2022	Exhibit 39 reviewed	Heather Leonard	0.1
11/2/2022	Exhibit 41 reviewed	Heather Leonard	0.1

11/2/2022	MSJ RESPONSE V2 - Heather Pass created, then edited.	Heather Leonard	6.7
11/2/2022	Key 000131 - Key 000248 Redacted reviewed	Heather Leonard	0.1
11/2/2022	1 email sent/reviewed regarding Great job on this	Heather Leonard	0.1
11/2/2022	SJ Brief fact check chart reviewed	Heather Leonard	0.1
11/2/2022	8044773 Key.Davita M. 062022.full reviewed	Heather Leonard	0.2
11/2/2022	1 email sent/reviewed regarding Key - MSJ Response	Heather Leonard	0.1
10/31/2022	3 emails sent/reviewed regarding Key	Heather Leonard	0.1
10/31/2022	1 email sent/reviewed regarding Key - Opposition to motion to supplement	Heather Leonard	0.1
10/30/2022	4 emails sent/reviewed regarding Key	Heather Leonard	0.1
10/30/2022	2 emails sent/reviewed regarding Key v HMMA/Dynamic update	Heather Leonard	0.1
10/30/2022	1 email sent/reviewed regarding Key facts - v3	Heather Leonard	0.1
10/27/2022	1 email sent/reviewed regarding Citation Check Chart - completed (kEY)	Heather Leonard	0.1
10/26/2022	2 internal messages sent/reviewed	Heather Leonard	0.1
10/25/2022	1 email sent/reviewed regarding Key - Opposition to motion to supplement	Heather Leonard	0.1
10/25/2022	HMMA Response to Interrogatories - 2021.12.09 reviewed	Heather Leonard	0.1
10/25/2022	Ex 1 - HMMA R26 Disclosures created	Heather Leonard	0.1
10/25/2022	Response to motion to file supplemental brief due attended	Heather Leonard	0.5
10/25/2022	Cover Sheet - Ex 2 created, then edited	Heather Leonard	0.1
10/25/2022	- Response to Motion for Leave to File Supplemental Brief - to file created, then edited	Heather Leonard	0.4
10/25/2022	Working on Key MSJ Responses	Heather Leonard	2
10/25/2022	Cover Sheet - Ex 1 created, then edited	Heather Leonard	0.1
10/25/2022	Ex 2 - HMMA Interrogatory Answers created	Heather Leonard	0.1
10/24/2022	PL - Response to Motion for Leave to File Supplemental Brief edited	Heather Leonard	2.1
10/24/2022	Doc. 67- MSJ Brief by HMMA reviewed	Heather Leonard	0.1
10/24/2022	1 email sent/reviewed regarding Key v HMMA - EEOC filings in ND AL	Heather Leonard	0.1
10/24/2022	email sent/reviewed regarding Etrans for Key - these are the only transcripts I've got	Heather Leonard	0.1
10/24/2022	ON for Leave to File Supplemental Brief by Hyundai Motor Manufacturing Alabama, LLC. reviewed	Heather Leonard	0.1
10/24/2022	Wilson v. Sprint_United Mgmt. Co._ 2011 U.S. Dist. LEXIS 73743 edited	Heather Leonard	0.2
10/24/2022	1 email sent/reviewed regarding Key - Opposition to motion to supplement	Heather Leonard	0.1
10/24/2022	HMMA Response to Interrogatories - 2021.12.09 reviewed	Heather Leonard	0.1
10/24/2022	Doc. 68-12 - Exhibit 12 - Plf's Depo Transcript -part 1 reviewed	Heather Leonard	0.1
10/24/2022	2 emails sent/reviewed regarding Key - EEOC screw up does not fall on us	Heather Leonard	0.3
10/24/2022	For MSJ Response brief - objection to Gloria Robinson Declaration edited	Heather Leonard	0.1

10/24/2022	Wilkerson v. Grinnell Corp._ 270 F.3d 1314 reviewed	Heather Leonard	0.2
10/24/2022	Doc. 68-2 -Exhibit 2 -Depo Transcript of R. Burns reviewed	Heather Leonard	0.1
10/20/2022	1 email sent/reviewed regarding Key v HMMA, HEA and Dynamic	Heather Leonard	0.4
10/20/2022	2 emails sent/reviewed regarding Answers	Heather Leonard	0.1
10/20/2022	email sent/reviewed regarding Etrans for Key - these are the only transcripts I've got	Heather Leonard	0.1
10/20/2022	1 email sent/reviewed regarding Key - v HMMA Et al - Dynamic Spires Eratta Sheet	Heather Leonard	0.1
10/20/2022	PL - Response to Motion for Leave to File Supplemental Brief edited	Heather Leonard	0.7
10/19/2022	ON for Leave to File Supplemental Brief by Hyundai Motor Manufacturing Alabama, LLC. reviewed	Heather Leonard	0.1
10/19/2022	PL - Response to Motion for Leave to File Supplemental Brief edited	Heather Leonard	0.4
10/18/2022	LEXIS research for objection to Robinson SJ declaration	Heather Leonard	0.5
10/18/2022	HMMA Response to RPF - 2021.12.08 reviewed	Heather Leonard	0.1
10/18/2022	Doc. 68-13 - Exhibit 12 - Plf's Depo Transcript Part 2 reviewed	Heather Leonard	0.1
10/18/2022	tivity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Order to S	Heather Leonard	0.1
10/18/2022	r MSJ Response brief - objection to Gloria Robinson Declaration created, then edited	Heather Leonard	1.6
10/18/2022	Doc. 68-12 - Exhibit 12 - Plf's Depo Transcript -part 1 reviewed	Heather Leonard	0.1
10/18/2022	ved regarding Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
10/18/2022	.sent/reviewed regarding Key MSJ Response - section objecting to Robinson's declaration	Heather Leonard	0.1
10/18/2022	Memo edited - 2022.06.21 - Email from client on 8/1/17 email	Heather Leonard	0.1
10/18/2022	Composite exhibit of deposition scheduling emails reviewed	Heather Leonard	0.1
10/18/2022	Untimely produced declaratoin - Duncan v Davita Healthcare Partners created	Heather Leonard	0.1
10/18/2022	Doc. 57 - ORDER it is ORDERED that the 56]motion to amend is GRANTED reviewed	Heather Leonard	0.1
10/18/2022	PL - Response to Motion for Leave to File Supplemental Brief created, then edited	Heather Leonard	0.4
10/18/2022	Doc. 68-5 - Exhibit 5 - Declaration of G. Robinson reviewed	Heather Leonard	0.1
10/17/2022	1 email sent/reviewed regarding Fact Check Assignment on Trello	Heather Leonard	0.1
10/13/2022	Review HMMA MSJ Filings (Docs 66-68)	Heather Leonard	2.1
10/13/2022	i ENG America, Inc._Key - Letter to Judge Marks enc. Courtesy Copy Binder of HEA's MSJ, Brief and Eviden	Heather Leonard	0.1
10/13/2022	Review HEA MSJ Brief (Doc. 70)	Heather Leonard	0.5
10/13/2022	Read Dynamic's MSJ Brief (Doc. 74)	Heather Leonard	0.5
10/13/2022	view Docs. 76-77 - Briefing orders on dispositive motions and supplemental briefing	Heather Leonard	0.1
10/13/2022	tivity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Order to	Heather Leonard	0.2
10/13/2022	2 emails sent/reviewed regarding HMMA's Motion for Summary Judgment	Heather Leonard	0.2
10/13/2022	nt/reviewed regarding HEA and Dynamic Brief's fact sections for you to type in your response	Heather Leonard	0.1
10/12/2022	2 emails sent/reviewed regarding Key v. HMMA et al - HEA SJ Filings	Heather Leonard	0.1

10/12/2022	2 emails sent/reviewed regarding Key v. HMMA	Heather Leonard	0.1
10/12/2022	2 emails sent/reviewed regarding HMMA's Motion for Summary Judgment	Heather Leonard	0.1
10/11/2022	1 email sent/reviewed regarding Case	Heather Leonard	0.1
10/11/2022	1 email sent/reviewed regarding Signed Errata Sheet, Cassandra Williams, Job #36228	Heather Leonard	0.1
10/11/2022	4 emails sent/reviewed regarding Key v Dynamic - Spiers deposition to summarize	Heather Leonard	0.1
10/11/2022	1 email sent/reviewed regarding Key v. HMMA	Heather Leonard	0.1
10/4/2022	1 email sent/reviewed regarding Key v HMMA - Riddle deposition to summarize	Heather Leonard	0.1
10/4/2022	1 email sent/reviewed regarding Key v Dynamic - Spiers deposition to summarize	Heather Leonard	0.1
10/4/2022	email sent/reviewed regarding key v dynamic - unemployment hearing to summarize	Heather Leonard	0.1
10/3/2022	4 messages sent/reviewed	Heather Leonard	0.1
10/1/2022	3 emails sent/reviewed regarding Key depo- Carolyn Williams	Heather Leonard	0.1
10/1/2022	1 email sent/reviewed regarding Deposition Scheduling for October 17 and 18	Heather Leonard	0.1
9/25/2022	1 email sent/reviewed regarding Case	Heather Leonard	0.1
9/23/2022	1 email sent/reviewed regarding Payment Received	Heather Leonard	0.1
9/23/2022	ding Job 36228 Electronic Deposition Transcript of Cassandra Williams taken on Tuesday, September 6, :	Heather Leonard	0.1
9/23/2022	1 message sent/reviewed	Heather Leonard	0.1
9/15/2022	1 email sent/reviewed regarding Order Confirmation	Heather Leonard	0.1
9/15/2022	Court - Notice Concerning Settlement and Mediation edited and reviewed	Heather Leonard	0.1
9/15/2022	1 email sent/reviewed regarding Key v. HMMA, HEA, Dynamic 2:19-cv-767-ECM	Heather Leonard	0.1
9/15/2022	1 email sent/reviewed regarding JOB11899 Transcript Files Ray Cureton	Heather Leonard	0.1
9/15/2022	viewed regarding Key v HMMA, HEA, and Dynamic - Notice Concerning Settlement and Mediation	Heather Leonard	0.1
9/13/2022	rding Invoice 20035 from Cite, LLC -- In the Matter of:Key v. Hyundai Motor Manfacturing Alabama LLC., e	Heather Leonard	0.4
9/13/2022	Email attachment reviewed - Invoice-20035	Heather Leonard	0.1
9/13/2022	1 email sent/reviewed regarding Mailroom position	Heather Leonard	0.1
9/12/2022	1 email sent/reviewed regarding Key - unemployment hearing	Heather Leonard	0.1
9/8/2022	30(b)(6) Deposition Notice - HEA edited	Heather Leonard	0.4
9/7/2022	viewed regarding Key v HMMA, HEA, and Dynamic - Notice Concerning Settlement and Mediation	Heather Leonard	0.1
9/7/2022	Ex 41 reviewed	Heather Leonard	0.3
9/7/2022	Deposition Re-notice - Ray Cureton edited	Heather Leonard	0.1
9/7/2022	Court - Notice Concerning Settlement and Mediation created, then edited	Heather Leonard	0.1
9/6/2022	Ex 55 HMMA Pay Raises reviewed	Heather Leonard	0.1
9/6/2022	Ex 5 - Contractor Handbook 135-235 reviewed	Heather Leonard	0.1
9/6/2022	Ex 41 reviewed	Heather Leonard	0.3

9/6/2022	Ex 11 - HEA Pstn Sment HEA 53-56 reviewed	Heather Leonard	0.1
9/6/2022	Ex 20 Mailroom Job Duties reviewed	Heather Leonard	0.1
9/6/2022	HEA0163 - HEA0236 reviewed	Heather Leonard	0.1
9/6/2022	Dynamic - Key - 003224-003283 - Confidential reviewed	Heather Leonard	0.1
9/6/2022	Ex 9 - Appearance Standards for Security Personnel HEA 1-3 reviewed	Heather Leonard	0.1
9/6/2022	Ex 40 reviewed	Heather Leonard	0.1
9/6/2022	HEA0241 reviewed	Heather Leonard	0.1
9/6/2022	Dynamic - Key - 000140-000145 reviewed	Heather Leonard	0.1
9/6/2022	HEA 30(b)(6)/Cassandra Williams Deposition	Heather Leonard	3.5
9/6/2022	Ex 36 reviewed	Heather Leonard	0.1
9/6/2022	Ex 47 - Mailroom Pay Issues reviewed	Heather Leonard	0.1
9/5/2022	HEA0252 created	Heather Leonard	0.1
9/5/2022	Outline - HEA created, then edited	Heather Leonard	0.5
9/5/2022	Email attachment reviewed - HEA0280	Heather Leonard	0.1
9/5/2022	Email attachment reviewed - HEA0252	Heather Leonard	0.1
9/5/2022	ed regarding Key v. Dynamic et al - Dynamic production 635-3283 [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
9/5/2022	1 email sent/reviewed regarding Deposition on Tuesday	Heather Leonard	0.1
9/5/2022	2 emails sent/reviewed regarding settlement conference: Key v HMMA	Heather Leonard	0.1
9/2/2022	uesday, September 6, 2022 Re: Davita M. Key v. Hyundai Motor Manufacturing Alabama, LLC; Hyundai En	Heather Leonard	0.1
8/29/2022	1 email sent/reviewed regarding Please print	Heather Leonard	0.1
8/29/2022	squire 2022.08.29 Re paying bill for plaintiff depo created, then edited and reviewed	Heather Leonard	0.1
8/29/2022	iil sent/reviewed regarding Please Confirm -- Job11899 Video Deposition ofRay Cureton	Heather Leonard	0.1
8/29/2022	iil sent/reviewed regarding Please Confirm -- Job11899 Video Deposition ofRay Cureton	Heather Leonard	0.1
8/25/2022	Def 2022.08.25 - HMMA Response to Rule 37 Letter created	Heather Leonard	0.1
8/25/2022	1 email sent/reviewed regarding D. Key v. HMMA, et al.	Heather Leonard	0.1
8/25/2022	HMMA, HEA, and Dynamic - Defendant Dynamic's Third Amended Initial Disclosures [IWOV-WSACTIVELL	Heather Leonard	0.1
8/24/2022	iil sent/reviewed regarding Please Confirm -- Job11853 Video Deposition ofRay Cureton	Heather Leonard	0.1
8/24/2022	ed regarding D. Key v. HMMA, et al. Currenton depo time - 9:00 am [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.3
8/24/2022	iil sent/reviewed regarding Please Confirm -- Job11853 Video Deposition ofRay Cureton	Heather Leonard	0.1
8/24/2022	iil sent/reviewed regarding Please Confirm -- Job11853 Video Deposition ofRay Cureton	Heather Leonard	0.1
8/24/2022	iil sent/reviewed regarding Please Confirm -- Job11853 Video Deposition ofRay Cureton	Heather Leonard	0.1
8/24/2022	iil sent/reviewed regarding Please Confirm -- Job11899 Video Deposition ofRay Cureton	Heather Leonard	0.1
8/24/2022	irding Activity in Case 2:22-cv-00505-MHH Key v. Hyundai Motor Manufacturing Alabama LLC et al Transc	Heather Leonard	0.1

8/24/2022	Deposition Re-notice - Fourth - Ray Cureton created, then edited	Heather Leonard	0.1
8/23/2022	1 email sent/reviewed regarding Deposition	Heather Leonard	0.1
8/23/2022	ed regarding D. Key v. HMMA, et al. Currenton depo time - 9:00 am [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
8/23/2022	email sent/reviewed regarding D. Key v. HMMA, et al. Currenton depo time - 9:00 am	Heather Leonard	0.1
8/23/2022	Deposition Re-notice - Third - Ray Cureton created, then edited	Heather Leonard	0.2
8/23/2022	viewed regarding D. Key v. HMMA, et al. Currenton depo time [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
8/23/2022	ail sent/reviewed regarding Please Confirm -- Job11853 Video Deposition ofRay Cureton	Heather Leonard	0.1
8/23/2022	ail sent/reviewed regarding Please Confirm -- Job11853 Video Deposition ofRay Cureton	Heather Leonard	0.1
8/23/2022	ail sent/reviewed regarding Please Confirm -- Job11853 Video Deposition ofRay Cureton	Heather Leonard	0.1
8/22/2022	/reviewed regarding Key v HMMA, HEA, Dynamic - deposition notice for HEA 30(b)(6)/Williams	Heather Leonard	0.1
8/22/2022	il sent/reviewed regarding Please Confirm -- Job11853 Video Deposition ofRay Cureton	Heather Leonard	0.1
8/22/2022	! Tuesday, September 6, 2022 Re: Davita M. Key v. Hyundai Motor Manufacturing Alabama, LLC; Hyunda	Heather Leonard	0.1
8/22/2022	Hearing on EEOC Motion to Quash (Phone) attended	Heather Leonard	0.5
8/22/2022	il sent/reviewed regarding Please Confirm -- Job11756 Video Deposition ofRay Cureton	Heather Leonard	0.1
8/22/2022	arding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al C	Heather Leonard	0.1
8/22/2022	il sent/reviewed regarding Please Confirm -- Job11853 Video Deposition ofRay Cureton	Heather Leonard	0.1
8/22/2022	1 email sent/reviewed regarding Your letter of August 10, 2022	Heather Leonard	0.1
8/22/2022	Notice of Appearance created, then edited	Heather Leonard	0.1
8/22/2022	il sent/reviewed regarding Job Cancellation -- Job11756 Video Deposition ofRay Cureton	Heather Leonard	0.1
8/22/2022	il sent/reviewed regarding Job Cancellation -- Job11756 Video Deposition ofRay Cureton	Heather Leonard	0.1
8/22/2022	Deposition Re-notice - Second - Ray Cureton created, then edited	Heather Leonard	0.2
8/22/2022	iewed regarding Court Reporter Request - Deposition on 9/6 at 9:30 at Bradley's Montgomery Office	Heather Leonard	0.1
8/22/2022	Subpoena to Testify in a Civil Action - Ray Cureton edited	Heather Leonard	0.1
8/22/2022	sent/reviewed regarding Key v HMMA, HEA, and Dynamic - Cureton renotice and subpoena	Heather Leonard	0.1
8/22/2022	Deposition Notice - Williams, Cassandra edited	Heather Leonard	0.1
8/22/2022	egarding Activity in Case 2:22-cv-00505-MHH Key v. Hyundai Motor Manufacturing Alabama LLC et al Ord	Heather Leonard	0.1
8/22/2022	Review Doc. 64 - Order on motion to take deposition out of tem	Heather Leonard	0.1
8/22/2022	30(b)(6) Deposition Re - Notice - HEA created, then edited	Heather Leonard	0.3
8/22/2022	1 email sent/reviewed regarding D. Key v. HMMA	Heather Leonard	0.1
8/19/2022	nt/reviewed regarding Key v HMMA, HEA, and Dynamic - deposition scheduling call summary	Heather Leonard	0.1
8/19/2022	Dynamic Security, Inc.'s Amended Objections to Re-Notice Rule 30(b)(6) Deposition of Dynamic Security	Heather Leonard	0.1
8/19/2022	iewed regarding Key v HMMA, HEA, and Dynamic - motion to take Williams/HEA 30(b)(6) on Sept 6	Heather Leonard	0.1
8/19/2022	1 email sent/reviewed regarding Dynamic	Heather Leonard	0.1

8/19/2022	Depo Notes - Dynamic - Crystal Riddle/30(b)(6) created, then edited and reviewed	Heather Leonard	1.3
8/19/2022	Inc.'s Amended Objections to Re-Notice Rule 30(b)(6) Deposition of Dynamic Security, Inc. [EM 08-18-20	Heather Leonard	0.1
8/19/2022	/reviewed regarding Dynamic 30(b)(6) Deposition Exhibits [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
8/19/2022	Dynamic Security, Inc.'s Amended Objections to Re-Notice Rule 30(b)(6) Deposition of Dynamic Security,	Heather Leonard	0.1
8/19/2022	2 emails sent/reviewed regarding Scheduling Request: Heather Leonard, PC	Heather Leonard	0.1
8/19/2022	egarding Key v. HMMA, HEA, and Dynamic - 30(b)(6) Notice to Dynamic [IWOV-WSACTIVELLP.FID199733:	Heather Leonard	0.1
8/19/2022	HEA0237 created	Heather Leonard	0.1
8/19/2022	Deposition of Kristal Riddle	Heather Leonard	5
8/19/2022	Deposition of Sherry Spires	Heather Leonard	1.8
8/19/2022	2 emails sent/reviewed regarding HEA - PRODUCTION	Heather Leonard	0.2
8/19/2022	arding Andrew Robinson has shared the folder 'Dynamic Key Production to Plaintiff on 08182022' with yc	Heather Leonard	0.1
8/19/2022	1 email sent/reviewed regarding Key v HMMA - EEOC filings in ND AL	Heather Leonard	0.1
8/19/2022	30(b)(6) Deposition Notice - HEA edited	Heather Leonard	0.3
8/19/2022	Motion to Take Deposition Out of Time - Draft created, then edited	Heather Leonard	0.5
8/19/2022	1 email sent/reviewed regarding Dynamic 30(b)(6) Deposition Exhibits	Heather Leonard	0.1
8/19/2022	Depo Notes - Dynamic - Crystal Riddle/30(b)(6) created, then edited	Heather Leonard	0.3
8/19/2022	ail sent/reviewed regarding Please Confirm -- Job11756 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/19/2022	Deposition Notice - Ray Cureton edited	Heather Leonard	0.1
8/19/2022	Doc. 57 - ORDER it is ORDERED that the 56]motion to amend is GRANTED reviewed	Heather Leonard	0.1
8/18/2022	:garding Key v. HMMA, HEA, and Dynamic - 30(b)(6) Notice to Dynamic [IWOV-WSACTIVELLP.FID199733E	Heather Leonard	0.1
8/18/2022	nt/reviewed regarding Key v HMMA, HEA, and Dynamic - deposition scheduling call summary	Heather Leonard	0.1
8/15/2022	nail sent/reviewed regarding Key v HMMA, HEA, and Dynamic - 30(b)(6) Notice to HEA	Heather Leonard	0.1
8/15/2022	email sent/reviewed regarding Key v Dynamic Security - settlement communicaiton	Heather Leonard	0.1
8/15/2022	Def - Dynamic - 2022.08.15 - Re settlement edited	Heather Leonard	0.1
8/15/2022	1 email sent/reviewed regarding Davita Key v. HMMA, et al	Heather Leonard	0.1
8/15/2022	emails sent/reviewed regarding Key - Updated Damages Spreadsheet and doc index	Heather Leonard	0.1
8/15/2022	1 email sent/reviewed regarding Cureton Subpoena	Heather Leonard	0.1
8/15/2022	nt/reviewed regarding Key v HMMA, HEA, and Dynamic - deposition scheduling call summary	Heather Leonard	0.1
8/15/2022	nt/reviewed regarding Key v HMMA, HEA, and Dynamic - Notice for Ray Cureton's Deposition	Heather Leonard	0.1
8/15/2022	1 email sent/reviewed regarding Key v HMMA, HEA, Dynamic	Heather Leonard	0.1
8/12/2022	emails sent/reviewed regarding Key - Updated Damages Spreadsheet and doc index	Heather Leonard	0.1
8/11/2022	sent/reviewed regarding Key v Dynamic - draft settlement letter for your review and revision	Heather Leonard	0.1
8/11/2022	Def - Dynamic - 2022.08.11 - Re settlement - draft created, then edited	Heather Leonard	0.2

8/10/2022	ing Key v. Dynamic Security, Inc., et al./Second Amended Initial Disclosures [IWOV-WSACTIVE LLP.FID1997338]	Heather Leonard	0.1
8/10/2022	Deposition Re-notice - Ray Cureton edited	Heather Leonard	0.2
8/10/2022	ail sent/reviewed regarding Please Confirm -- Job11756 Video Deposition ofRay Cureton	Heather Leonard	0.1
8/10/2022	1 email sent/reviewed regarding Key v. HMMA et al - Discovery Deficiencies	Heather Leonard	0.1
8/10/2022	Subpoena to Testify in a Civil Action - Ray Cureton created, then edited	Heather Leonard	0.1
8/10/2022	2 emails sent/reviewed regarding Davita Damages	Heather Leonard	0.1
8/10/2022	Def - Dynamic - Second Amended Initial Disclosures reviewed	Heather Leonard	0.1
8/10/2022	ail sent/reviewed regarding Please Confirm -- Job11756 Video Deposition ofRay Cureton	Heather Leonard	0.1
8/10/2022	3 emails sent/reviewed regarding Scheduling Request: Heather Leonard, PC	Heather Leonard	0.1
8/10/2022	Def 2022.08.10 - Letter to Ford Harrison, LLP re Cureton mileage fee created	Heather Leonard	0.1
8/10/2022	2 emails sent/reviewed regarding Key v. HMMA et al - HMMA post depo deficiency	Heather Leonard	0.1
8/9/2022	email sent/reviewed regarding Key v HMMA, HEA, and Dynamic - re Notice - Dynamic	Heather Leonard	0.1
8/9/2022	nt/reviewed regarding Key v HMMA, HEA, and Dynamic - Notice for Ray Cureton's Deposition	Heather Leonard	0.1
8/9/2022	Deposition Scheduling Discussion (Microsoft Teams Meeting) attended	Heather Leonard	0.5
8/9/2022	nt/reviewed regarding Key v HMMA, HEA, and Dynamic - deposition scheduling call summary	Heather Leonard	0.4
8/9/2022	Deposition Re-notice - Ray Cureton created, then edited	Heather Leonard	0.4
8/9/2022	sent/reviewed regarding Key v. Dynamic Security, Inc. [IWOV-WSACTIVE LLP.FID1997338]	Heather Leonard	0.1
8/8/2022	egarding Key v. HMMA, HEA, and Dynamic - 30(b)(6) Notice to Dynamic [IWOV-WSACTIVE LLP.FID1997338]	Heather Leonard	0.1
8/8/2022	ails sent/reviewed regarding Key v HMMA, HEA, and Dynamic - 30(b)(6) Notice to HEA	Heather Leonard	0.1
8/8/2022	ewed regarding Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVE LLP.FID1997338]	Heather Leonard	0.4
8/5/2022	2 emails sent/reviewed regarding Key v. Hyundai et al - Nicole Scavella Statement	Heather Leonard	0.1
7/29/2022	wed regarding Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVE LLP.FID1997338]	Heather Leonard	0.3
7/28/2022	eviewed regarding [NELA-AL] : Recording and Transcript of unemployment compensation hearing	Heather Leonard	0.1
7/26/2022	1 email sent/reviewed regarding Key - witness info Scavella and Robinson	Heather Leonard	0.1
7/25/2022	ved regarding Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVE LLP.FID1997338]	Heather Leonard	0.1
7/25/2022	ved regarding Answer and MTD in Dynamic Security v. Hargrove / SPA - 20-CV-2022-900074.00 - KWB	Heather Leonard	0.1
7/25/2022	L email sent/reviewed regarding Key v HMMA, HEA and Dynamic - Deposition Dates	Heather Leonard	0.1
7/22/2022	ils sent/reviewed regarding Key Deposition to Summarize - HMMA 30(b)(6) Robert Burns	Heather Leonard	0.2
7/22/2022	emails sent/reviewed regarding Key v HMMA, HEA and Dynamic - Deposition Dates	Heather Leonard	0.1
7/20/2022	L email sent/reviewed regarding Key v HMMA, HEA and Dynamic - Deposition Dates	Heather Leonard	0.1
7/14/2022	1 email sent/reviewed regarding Outline from Key	Heather Leonard	0.1
7/14/2022	Exhibit 6 reviewed	Heather Leonard	0.1
7/13/2022	1 email sent/reviewed regarding Automatic reply: Paychecks	Heather Leonard	0.1

7/12/2022	3 emails sent/reviewed regarding Case	Heather Leonard	0.1
7/12/2022	1 email sent/reviewed regarding Hair Discrimination Research memo	Heather Leonard	0.1
7/12/2022	email sent/reviewed regarding Key Deposition to Summarize - HMMA 30(b)(6) Robert Burns	Heather Leonard	0.1
7/11/2022	https://www.wsfa.com/2022/07/08/director-alabama-hyundai-plant-claims-discrimination-wrongful-ter	Heather Leonard	0.1
7/11/2022	1 message sent/reviewed	Heather Leonard	0.1
7/11/2022	Email attachment reviewed - Davita Key depo summary	Heather Leonard	0.1
7/11/2022	2 emails sent/reviewed regarding Key, Davita - deposition to summarize	Heather Leonard	0.1
7/7/2022	Esquire Deposition Solutions Files Are Now Available! Witness: Davita M Key, Date: 06/20/2022, Job Nurr	Heather Leonard	0.1
7/7/2022	1 email sent/reviewed regarding Key, Davita - copy job	Heather Leonard	0.1
7/7/2022	1g EsquireConnect Registration from Heather Leonard, Heather Leonard, PC: Heather@HeatherLeonardP	Heather Leonard	0.1
7/7/2022	1 email sent/reviewed regarding EsquireConnect Client Portal Password Reset	Heather Leonard	0.1
7/7/2022	1 internal message sent/reviewed	Heather Leonard	0.1
7/6/2022	1 email sent/reviewed regarding JOB11184 Transcript Files Robert Burns	Heather Leonard	0.1
7/6/2022	rding Invoice 19091 from Cite, LLC -- In the Matter of:Key v. Hyundai Motor Manfacturing Alabama LLC., e	Heather Leonard	0.1
7/6/2022	1 email sent/reviewed regarding JOB11184 Transcript Files Robert Burns	Heather Leonard	0.1
6/27/2022	1 email sent/reviewed regarding Pictures	Heather Leonard	0.1
6/27/2022	1 email sent/reviewed regarding Case	Heather Leonard	0.1
6/24/2022	Research Project on Joint Employer created, then edited	Heather Leonard	0.8
6/24/2022	1 email sent/reviewed regarding Hair Pictures	Heather Leonard	0.1
6/23/2022	Deko Post Mortem Sheet reviewed	Heather Leonard	0.2
6/23/2022	Outline - 30(b)(6) HMMA edited	Heather Leonard	0.1
6/23/2022	Outline - 30(b)(6) HMMA edited	Heather Leonard	0.1
6/23/2022	1 email sent/reviewed regarding Case	Heather Leonard	0.1
6/22/2022	HEA0163 - HEA0236 reviewed	Heather Leonard	0.2
6/22/2022	IMG-2495 reviewed	Heather Leonard	0.2
6/22/2022	Take HMMA 30(b)(6) Depositoin	Heather Leonard	7
6/22/2022	IMG-2495 reviewed	Heather Leonard	0.2
6/21/2022	Memo created - 2022.06.21 - Email from clien ton 8/1/17 email	Heather Leonard	0.1
6/21/2022	1 email sent/reviewed regarding Deposition	Heather Leonard	0.1
6/21/2022	2 emails sent/reviewed regarding Dox for tomorrow	Heather Leonard	0.1
6/21/2022	sent/reviewed regarding Key v. HMMA et al - updated 30(b)(6) Depo Notice - HMMA - parking	Heather Leonard	0.1
6/21/2022	2 emails sent/reviewed regarding Case	Heather Leonard	0.1
6/20/2022	HMMA000001- HMMA000009 reviewed	Heather Leonard	0.1

6/20/2022	mail sent/reviewed regarding Key v. HMMA et al - updated 30(b)(6) Depo Notice - HMMA	Heather Leonard	0.1
6/20/2022	mail sent/reviewed regarding Key v. HMMA et al - updated 30(b)(6) Depo Notice - HMMA	Heather Leonard	0.1
6/20/2022	30(b)(6) Deposition Notice - HMMA Updated (updated served 6-13) reviewed	Heather Leonard	0.1
6/20/2022	Notes - Deposition of D Key - 2022.06.20 created, then edited	Heather Leonard	0.7
6/20/2022	Depo Post Mortem Sheet edited	Heather Leonard	0.2
6/20/2022	Notes - Deposition of D Key - 2022.06.20 edited	Heather Leonard	0.4
6/20/2022	HEA0001 - HEA0066 reviewed	Heather Leonard	0.1
6/20/2022	Prepare for HMMA 30(b)(6) Deposition While Listening to Production and selected exhibits; used the docu	Heather Leonard	4.2
6/20/2022	viewed regarding Key v HMMA, HEA, and Dynamic - exhibits for HMMA 30(b)(6) deposition on 6/22	Heather Leonard	0.1
6/20/2022	30(b)(6) Deposition Notice - HMMA Updated (updated served 6-13) reviewed	Heather Leonard	0.1
6/20/2022	Ex 1 - 30(b)(6) Deposition Notice created	Heather Leonard	0.2
6/20/2022	All Exhibits Combined created, then reviewed	Heather Leonard	0.1
6/20/2022	LEXIS research on cases where courts found joint employer status	Heather Leonard	2.2
6/20/2022	1 sent/reviewed regarding what i need printed for depositions in Montgomery in Wed 6/22	Heather Leonard	0.1
6/20/2022	1 email sent/reviewed regarding Exhibits for HMMA 30(b)(6)	Heather Leonard	0.1
6/20/2022	HEA0163 - HEA0236 reviewed	Heather Leonard	0.3
6/20/2022	Ex 1 - 30(b)(6) Deposition Notice created	Heather Leonard	0.2
6/20/2022	HMMA000013 - HMMA000235 reviewed	Heather Leonard	0.1
6/20/2022	Outline - 30(b)(6) HMMA created, then edited	Heather Leonard	2
6/20/2022	30(b)(6) Deposition Notice - HMMA reviewed	Heather Leonard	0.1
6/19/2022	Notes - Deposition of D Key - 2022.06.20 created, then edited	Heather Leonard	0.1
6/19/2022	2 emails sent/reviewed regarding Deposition	Heather Leonard	0.1
6/19/2022	Notes - Deposition of D Key - 2022.06.20 created, then edited	Heather Leonard	0.1
6/19/2022	Depo Post Mortem Sheet created	Heather Leonard	0.1
6/16/2022	2 emails sent/reviewed regarding Key's deposition on Monday, June 20.	Heather Leonard	0.1
6/16/2022	2 emails sent/reviewed regarding Key's deposition on Monday, June 20.	Heather Leonard	0.1
6/16/2022	Schedule client's depo prep meeting	Heather Leonard	0.1
6/15/2022	1 email sent/reviewed regarding June 20th , 9:30 am deposition of Davita Key	Heather Leonard	0.1
6/15/2022	1 email sent/reviewed regarding June 20th , 9:30 am deposition of Davita Key	Heather Leonard	0.1
6/13/2022	mail sent/reviewed regarding Key v. HMMA et al - updated 30(b)(6) Depo Notice - HMMA	Heather Leonard	0.1
6/8/2022	1 email sent/reviewed regarding D. Key v. HMMA, et al.	Heather Leonard	0.1
6/8/2022	1 email sent/reviewed regarding Conference Room Scheduling	Heather Leonard	0.1
6/8/2022	sent/reviewed regarding Recording and Transcript of unemployment compensation hearing	Heather Leonard	0.1

6/8/2022	1 email sent/reviewed regarding Pay Information	Heather Leonard	0.1
6/8/2022	Deposition Preparation Meeting with client and Leslie	Heather Leonard	1.2
6/6/2022	1 email sent/reviewed regarding Key	Heather Leonard	0.1
6/3/2022	8 emails sent/reviewed regarding Key	Heather Leonard	0.2
6/3/2022	iewed regarding Key v. HMMA, HEA, and Dynamic - HEA's responses and objections to 30b6 notice	Heather Leonard	0.1
6/2/2022	3 emails sent/reviewed regarding Key	Heather Leonard	0.1
6/1/2022	1 email sent/reviewed regarding Key v HMMA, HEA and Dynamic	Heather Leonard	0.1
5/24/2022	1 email sent/reviewed regarding Key - status - for our files	Heather Leonard	0.1
5/24/2022	email sent/reviewed regarding Key v. Dynamic et al discovery letter and documents	Heather Leonard	0.1
5/24/2022	ter re: things to do, HEA's Title VII liability following their recent document production, and depositions	Heather Leonard	0.5
5/24/2022	email sent/reviewed regarding [NELA-AL] : Reinstating Previously Dismissed Claim	Heather Leonard	0.1
5/24/2022	ewed regarding Dynamic Security Objections to 30(b)(6) Notice [IWOV-WSACTIVELLP.FID1748607]	Heather Leonard	0.1
5/16/2022	ent/reviewed regarding Key v HMMA, HEA and Dynamic - follow up on deposition scheduling	Heather Leonard	0.1
5/16/2022	1 internal message sent/reviewed	Heather Leonard	0.1
5/16/2022	1 email sent/reviewed regarding D. Key v. HMMA, et al.	Heather Leonard	0.3
5/16/2022	I regarding Key v HMMA, HEA, and Dynamic - your deposition is set June 20, 2022 at 9:30 in Montgomery	Heather Leonard	0.1
5/16/2022	Email attachment reviewed - image_123986672	Heather Leonard	0.1
5/16/2022	5 emails sent/reviewed regarding Case	Heather Leonard	0.1
5/16/2022	2 messages sent/reviewed	Heather Leonard	0.1
5/16/2022	I sent/reviewed regarding Davita Key v Hyundai/Dynamic Deposition Preparation Meeting	Heather Leonard	0.1
5/16/2022	regarding Dale Bunting has shared the folder 'Dynamic - Key Production to Plaintiff 05112022' with you.	Heather Leonard	0.1
5/16/2022	Client - Depo Scheduling and Prep Letter.docx created, then edited	Heather Leonard	0.2
5/16/2022	regarding Dale Bunting has shared the folder 'Dynamic - Key Production to Plaintiff 05112022' with you.	Heather Leonard	0.1
5/12/2022	ent/reviewed regarding Key v HMMA, HEA and Dynamic - follow up on deposition scheduling	Heather Leonard	0.5
5/12/2022	7 emails sent/reviewed regarding Case	Heather Leonard	0.2
5/10/2022	1 email sent/reviewed regarding Case	Heather Leonard	0.1
4/25/2022	il sent/reviewed regarding Key v. HMMA, HEA, and Dynamic - 30(b)(6) Notice to Dynamic	Heather Leonard	0.1
4/25/2022	viewed regarding EEOC's Motion and Memorandum in Support of Its Motion to Quash Subpoenas	Heather Leonard	0.1
4/25/2022	1 email sent/reviewed regarding key v HMMA - look at ft. 7	Heather Leonard	0.1
4/25/2022	7 emails sent/reviewed regarding 22-mc-505, Key v. Hyundai Motor Mfg. Ala. LLC	Heather Leonard	0.1
4/25/2022	1 email sent/reviewed regarding See if any of this helps in Key	Heather Leonard	0.1
4/25/2022	ig Activity in Case 2:22-mc-00505-MHH Key v. Hyundai Motor Manufacturing Alabama LLC et al Motion to	Heather Leonard	0.1
4/25/2022	1 email sent/reviewed regarding Email: Wilkerson v. Grinnell Corp._ 270 F.3d 1314	Heather Leonard	0.1

4/25/2022	Memo created, then reviewed - Court Order Denying Motion to Quash on EEOC 1 email sent/reviewed regarding Davita Key v. HMMA, et al.	Heather Leonard	0.1
4/25/2022	:garding Key v. HMMA, HEA, and Dynamic - 30(b)(6) Notice to Dynamic [IWOV-WSACTIVE LLP.FID199733E	Heather Leonard	0.1
4/15/2022	eposition Subpoena - MOTION to Quash Subpoena by Equal Employment Opportunity Commission review	Heather Leonard	0.1
4/15/2022	1 email sent/reviewed regarding HMMA 30b6	Heather Leonard	0.1
4/15/2022	1 email sent/reviewed regarding Key v. Dynamic et al - Dynamic 30(b) notice	Heather Leonard	0.1
4/15/2022	memorandum in Support of MOTION to Quash Subpoena by Equal Employment Opportunity Commission re	Heather Leonard	0.1
4/15/2022	1 email sent/reviewed regarding Davita Key v. HMMA, et al	Heather Leonard	0.1
4/13/2022	1 email sent/reviewed regarding Dynamic Security is suing Chris Hargrove	Heather Leonard	0.1
4/13/2022	sent/reviewed regarding Key v. HMMA, HEA, Dynamic - PL Discovery Response to Dynamic	Heather Leonard	0.1
4/13/2022	1 email sent/reviewed regarding fyi -	Heather Leonard	0.1
4/11/2022	3 emails sent/reviewed regarding HMMA 30b6	Heather Leonard	0.1
4/6/2022	1 email sent/reviewed regarding Employment	Heather Leonard	0.1
4/5/2022	2 emails sent/reviewed regarding Key's 30 b 6 notice issued to HMMA	Heather Leonard	0.1
4/5/2022	1 email sent/reviewed regarding Employment	Heather Leonard	0.1
4/4/2022	Review Doc. 57 - Updated Scheduling Order	Heather Leonard	0.1
4/4/2022	ails sent/reviewed regarding Message For (7865749161:9699321) 2022-04-04 12:29PM	Heather Leonard	0.2
4/4/2022	mic - Key - Email dated 03-20-2019 w -Right to Sue attached - 000043-000048 reviewed	Heather Leonard	0.1
4/4/2022	30(b)(6) Deposition Notice - HEA created, then edited	Heather Leonard	0.9
4/4/2022	30(b)(6) Deposition Notice - Dynamic created, then edited	Heather Leonard	0.8
4/4/2022	ail sent/reviewed regarding Message For (7865749161:9698765) 2022-04-04 11:10AM	Heather Leonard	0.1
4/4/2022	Dynamic - Key - Production - 000049-000092 created	Heather Leonard	0.1
4/4/2022	Dynamic - Key - Initial Disclosures - 000001 - 000038 reviewed	Heather Leonard	0.1
4/4/2022	Memo created - Phone imaging tes on calls to vendors to image Plaintiff's ph	Heather Leonard	0.1
4/4/2022	email sent/reviewed regarding Draft notice to Dyanmic for your review and revision	Heather Leonard	0.1
4/4/2022	ent/reviewed regarding Key v HMMA, HEA and Dynamic - follc proposed deposition schedule for depositor	Heather Leonard	0.2
4/4/2022	30(b)(6) Deposition Notice - HMMA edited	Heather Leonard	0.1
4/4/2022	Dynamic - Key - 000146-000147 reviewed	Heather Leonard	0.1
4/4/2022	nail sent/reviewed regarding Key v HMMA, HEA, and Dynamic - 30(b)(6) Notice to HEA	Heather Leonard	0.1
4/4/2022	HEA0001 - HEA0066 reviewed	Heather Leonard	0.1
4/4/2022	nt/reviewed regarding Key v HMMA, HEA, and Dynamic - 30(b)(6) Deposition Notice to HMMA	Heather Leonard	0.2
4/4/2022	Matter admin	Heather Leonard	0.1
4/4/2022	Dynamic - Key - 000093-000111 reviewed	Heather Leonard	0.1

3/31/2022	HEA and Dynamic - Plaintiff's motion to amend the scheduling order and request for time to discuss discovery Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al O	Heather Leonard	0.1
3/31/2022	HEA and Dynamic - Plaintiff's motion to amend the scheduling order and request for time to discuss disc	Heather Leonard	0.1
3/30/2022		Heather Leonard	0.2
3/28/2022	Vitness 2022.03.28 - Letter re Initial Contact - Nicole Scavella created, then edited	Heather Leonard	0.1
3/28/2022	1 email sent/reviewed regarding Dynamic Security, Inc. / Davita Key	Heather Leonard	0.1
3/28/2022	Matter admin	Heather Leonard	0.1
3/28/2022	o has shared the folder 'Dynamic Security, Inc.- Davita M. Keys Second Production to Plaintiff produced 0	Heather Leonard	0.1
3/28/2022	Vitness 2022.03.28 - Letter re Initial Contact - Gloria Robinson created, then edited	Heather Leonard	0.1
3/28/2022	tness 2022.03..28 - Letter re Initial Contact - Maurice Chambliss created, then edited	Heather Leonard	0.1
3/28/2022	1 email sent/reviewed regarding Davita Key - Employment Earnings update	Heather Leonard	0.1
3/28/2022	PL - Motion to Amend Scheduling Order - Final to File created, then edited	Heather Leonard	0.2
3/28/2022	Vitness 2022.03.28 - Letter re Initial Contact - Latunya Howell created, then edited	Heather Leonard	0.1
3/28/2022	HEA and Dynamic - Plaintiff's motion to amend the scheduling order and request for time to discuss disc	Heather Leonard	0.2
3/28/2022	Witness 2022.03.28 - Letter re Initial Contact - Ray Cureton created, then edited	Heather Leonard	0.1
3/25/2022	HEA and Dynamic - Plaintiff's motion to amend the scheduling order, deposition scheduling, and issued motion, deposition scheduling, and iss	Heather Leonard	0.2
3/25/2022	Drafted Motion to Amend Scheduling Order	Heather Leonard	0.9
3/23/2022	1 email sent/reviewed regarding Key v HMMA - subpoena notice	Heather Leonard	0.1
3/23/2022	subpoena for deposition of A. Martin-Shutz created	Heather Leonard	0.1
3/21/2022	1 email sent/reviewed regarding Key v. HEA et al 2:10-cv-0767	Heather Leonard	0.1
3/21/2022	sent/reviewed regarding Key v. HEA et al 2:10-cv-0767 - Dynamic Security Discovery Requests	Heather Leonard	0.1
3/21/2022	PL - Draft Responses - HL Review created, then reviewed	Heather Leonard	0.2
3/21/2022	ail sent/reviewed regarding Key v. HEA et al 2:10-cv-0767 - Plaintiff Discovery Responses	Heather Leonard	0.1
3/21/2022	2 emails sent/reviewed regarding Key - Response to HEA Discovery	Heather Leonard	0.2
3/14/2022	1 email sent/reviewed regarding Dynamic Security, Inc. / Davita Key	Heather Leonard	0.1
3/14/2022	1 email sent/reviewed regarding Key v. HMMA et al - updated production	Heather Leonard	0.1
3/10/2022	ed regarding Davita Key v. Hyundai Motor Manufacturing Alabama, LLC, et al. - Depo Notice to Plaintiff	Heather Leonard	0.1
3/10/2022	ed regarding [NELA-AL] : Objection Re: subpoena documents on the basis of Joint defense agreement""	Heather Leonard	0.1
3/10/2022	s sent/reviewed regarding Key's tax returns and earnings records from 2017 to the present	Heather Leonard	0.1
3/9/2022	l sent/reviewed regarding Key's tax returns and earnings records from 2017 to the present	Heather Leonard	0.1
3/9/2022	ails sent/reviewed regarding Key v. HMMA, HEA, Dynamic 2:19-cv-0767 - Rule 37 Letter	Heather Leonard	0.1
3/1/2022	ails sent/reviewed regarding Davita Key's Draft Answers to discovery requests from HEA	Heather Leonard	0.1
2/25/2022	1 email sent/reviewed regarding Haven't forgotten about you	Heather Leonard	0.2
2/24/2022	5 emails sent/reviewed regarding Key	Heather Leonard	0.3

2/24/2022	1 email sent/reviewed regarding Message For (7865749161:9543144) 2022-02-24 04:02PM	Heather Leonard	0.1
2/23/2022	1 email sent/reviewed regarding Case	Heather Leonard	0.1
2/22/2022	1 email sent/reviewed regarding Haven't forgotten about you	Heather Leonard	0.1
2/21/2022	3 emails sent/reviewed regarding Haven't forgotten about you	Heather Leonard	0.1
2/18/2022	3 emails sent/reviewed regarding Haven't forgotten about you	Heather Leonard	0.1
2/17/2022	MMA HEA and Dynamic - HEA's First Discovery Requests to Plaintiff 4871-4300-8527 v.1 created	Heather Leonard	0.1
2/17/2022	Type in Defendant's Discovery Requests for	Heather Leonard	0.7
2/17/2022	2 emails sent/reviewed regarding Responses	Heather Leonard	0.1
2/17/2022	4 emails sent/reviewed regarding Haven't forgotten about you	Heather Leonard	0.1
2/14/2022	3 emails sent/reviewed regarding Key v HMMA - deposition of Plaintiff	Heather Leonard	0.1
2/8/2022	3 emails sent/reviewed regarding Employment	Heather Leonard	0.1
2/8/2022	1 email sent/reviewed regarding D. Key v. HMMA, et al.	Heather Leonard	0.1
2/7/2022	2 emails sent/reviewed regarding Davita Key v. HMMA, et al.	Heather Leonard	0.1
2/4/2022	Review HEA's discovery responses	Heather Leonard	0.2
2/4/2022	Matter admin	Heather Leonard	0.1
2/4/2022	Rey - Response to Pltf's 1st Requests for Admission, Interrogatories, and Requests for Production to Hyundai	Heather Leonard	0.1
1/30/2022	1 email sent/reviewed regarding Key proposed damages charts	Heather Leonard	0.1
1/30/2022	sent/reviewed regarding PI Supplemental Discovery Responses and Amended Disclosures	Heather Leonard	0.1
1/28/2022	2 emails sent/reviewed regarding Plaintiff Supplemental Discovery Response to HMMA	Heather Leonard	0.1
1/28/2022	1 email sent/reviewed regarding Heather's Backpay Chart	Heather Leonard	0.1
1/28/2022	1 email sent/reviewed regarding D. Key v. HMMA, et al.	Heather Leonard	0.1
1/28/2022	2 emails sent/reviewed regarding Key v. HMMR's request for another extension to respond	Heather Leonard	0.1
1/27/2022	S000382 - Certified Unemployment Records on D. Key from State of Alabama (produced by HMMA)	Heather Leonard	1.1
1/26/2022	sent/reviewed regarding Dynamic Discovery Responses [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
1/26/2022	email sent/reviewed regarding Key v. HMMA, HEA, Dynamic Case No. 2:19-CV-767-ECM	Heather Leonard	0.1
1/25/2022	COMM Call with L. Palmer re: Dynamic's discovery responses	Heather Leonard	0.3
1/19/2022	email sent/reviewed regarding Plaintiff Supplemental Discovery Response to HMMA	Heather Leonard	0.1
1/18/2022	email sent/reviewed regarding Key v HMMA, et al - Dynamic's discovery responses	Heather Leonard	0.1
1/18/2022	ved regarding Key v HMMA, et al - Dynamic's discovery responses [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
1/18/2022	ll set and requested by Defendant HMMA - call with Brown, Middlebrooks, Leonard, and Palmer	Heather Leonard	0.3
1/14/2022	2 emails sent/reviewed regarding Key - HMMA supplemental responses	Heather Leonard	0.1
1/14/2022	1 email sent/reviewed regarding Supplemental Interrogatory Response	Heather Leonard	0.1
1/13/2022	Def 2022.01.12 - Rule 37 Letter - Ford Harrison, LLP edited and reviewed	Heather Leonard	0.9

1/13/2022	y in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Add and Terr	Heather Leonard	0.1
1/13/2022	PL - First RFA, Interrogatories, and RPD to Dynamic - Served 2021.12.09 reviewed	Heather Leonard	0.2
1/13/2022	1 email sent/reviewed regarding Key v HMMA: Plaintiff's discovery responses	Heather Leonard	0.1
1/12/2022	Def 2022.01.12 - Rule 37 Letter - Ford Harrison, LLP created, then edited	Heather Leonard	1.5
1/12/2022	Def - Dynamic Response to RFA, RPD, and Interrogatories reviewed	Heather Leonard	0.1
1/12/2022	: Security's Objections to Plaintiff's First Requests for Admission, Requests for Production, and Interrogat	Heather Leonard	0.2
1/12/2022	email sent/reviewed regarding Rule 37 letter to Dynamic in Key - what I've done so far	Heather Leonard	0.1
1/11/2022	1 email sent/reviewed regarding Key v. HMMA, Dynamic Security and HEA	Heather Leonard	0.1
1/11/2022	1 email sent/reviewed regarding Key v HMMA: Plaintiff's discovery responses	Heather Leonard	0.1
1/11/2022	nt/reviewed regarding Key v HMMA, HEA, Dynamic - Plaintiff's discovery requests to Dynamic	Heather Leonard	0.1
1/10/2022	COMM Communicate - call with L. Palmer re: email from W. Brown re; alleged deficiencies in	Heather Leonard	0.2
1/10/2022	Memo created, then edited - 2022.01.10 - Tom Serrano call re: subpoena	Heather Leonard	0.1
1/10/2022	Matter admin	Heather Leonard	0.1
1/10/2022	4 emails sent/reviewed regarding Key v HMMA: Plaintiff's discovery responses	Heather Leonard	0.2
1/10/2022	1 email sent/reviewed regarding Addresses needed	Heather Leonard	0.1
1/10/2022	1 email sent/reviewed regarding Key Time	Heather Leonard	0.1
1/10/2022	2 emails sent/reviewed regarding Key v. HMMA, Dynamic Security and HEA	Heather Leonard	0.2
1/10/2022	Cloyd v Town of Newton - Call to Thomas Serrano RE: Subpoena to ESGR attended	Heather Leonard	0.5
1/4/2022	ding Key v HMMA, HEA, Dynamic - Plaintiff's discovery requests to Dynamic [IWOV-WSACTIVE LLP.FID199	Heather Leonard	0.2
1/4/2022	PL - First RFA, Interrogatories, and RPD to Dynamic - Served 2021.12.09 reviewed	Heather Leonard	0.1
1/4/2022	1 email sent/reviewed regarding Key v HMMA: Plaintiff's discovery responses	Heather Leonard	0.1
12/31/2021	2 emails sent/reviewed regarding Key v HMMA: Plaintiff's discovery responses	Heather Leonard	0.1
12/20/2021	1 email sent/reviewed regarding Davita Key v. HMMA, et al.	Heather Leonard	0.1
12/13/2021	- First RFA, Interrogatories, and RPD to HEA - Served 2021.12.09 w/proof-read, update certificate of service, : ent/reviewed regarding HMMA's Supplemental document production in response to RFP #1	Heather Leonard	0.1
12/13/2021	ent/reviewed regarding HMMA's Supplemental document production in response to RFP #1	Heather Leonard	0.1
12/13/2021	1 email sent/reviewed regarding Key	Heather Leonard	0.6
12/13/2021	Review HMMA's proposed subpoena to the AL DOL	Heather Leonard	0.1
12/13/2021	1 email sent/reviewed regarding Key v. Hyundai et al - Production of Documents	Heather Leonard	0.1
12/13/2021	1 email sent/reviewed regarding Key v HMMA, et al - HEA Insurance Coverage	Heather Leonard	0.1
12/13/2021	1 email sent/reviewed regarding Key v HMMA: Plaintiff's discovery responses	Heather Leonard	0.1
12/13/2021	1 email sent/reviewed regarding Davita Key v. HMMA, et al.	Heather Leonard	0.1
12/13/2021	Call with L. Palmer re: whether we have objections to HMMA's subpoena to AL DOL	Heather Leonard	0.1
12/10/2021	reviewed regarding Key v HMMA - objection to HMMA's designation of documents as confidential	Heather Leonard	0.1

12/9/2021	HMMA Response to RPF - 2021.12.08 reviewed	Heather Leonard	0.1
12/9/2021	PL - First RFA, Interrogatories, and RPD to Dynamic - Serveie Leslie's suggested changes as well as some	Heather Leonard	0.2
12/9/2021	HMMA Response to Interrogatories - 2021.12.09 reviewed	Heather Leonard	0.1
12/9/2021	HMMA000013 - HMMA000235 reviewed	Heather Leonard	1.4
12/9/2021	PL - First RFA, Interrogatories, and RPD to HEA - Draft edited	Heather Leonard	1
12/9/2021	30(b)(6) Deposition Notice - HMMA.docx created, then edited	Heather Leonard	1.1
12/9/2021	viewed regarding Key v HMMA - objection to HMMA's design re: producing their insurance agreement as i	Heather Leonard	0.1
12/9/2021	Reviewed HMMA's RFA Responses	Heather Leonard	0.1
12/9/2021	Davita Key Pleading Comparison reviewed	Heather Leonard	0.1
12/9/2021	1 email sent/reviewed regarding Key v HMMA, et al - HEA lie: producing their insurance agreement as re	Heather Leonard	0.1
12/9/2021	1 email sent/reviewed regarding Davita Key v. HMMA from HMMA re: their discovery response	Heather Leonard	0.1
12/9/2021	HEA0001 - HEA0066 reviewed	Heather Leonard	0.1
12/9/2021	HMMA Response to RFA - 2021.12.08 reviewed	Heather Leonard	0.1
12/8/2021	PL - First RFA, Interrogatories, and RPD to Dynamic - Draft edited	Heather Leonard	1.4
12/7/2021	s sent/reviewed regarding Key v. Hyundai et al - 2:19-CV-767-ECM - PL Disc resp to HMMA	Heather Leonard	0.1
12/7/2021	2 emails sent/reviewed regarding Key - Production	Heather Leonard	0.1
12/6/2021	2 emails sent/reviewed regarding Key v. Hyundai et al - Discovery Response Draft	Heather Leonard	0.1
12/6/2021	1 sent/reviewed regarding Key v. Hyundai et al - 2:19-CV-767-ECM - PL Disc resp to HMMA	Heather Leonard	0.5
12/3/2021	1 email sent/reviewed regarding Information	Heather Leonard	0.1
12/1/2021	Form, No Footer reviewed	Heather Leonard	0.1
12/1/2021	garding Davita Key v. HMMA, et al. - request for an extension to respond to discovery to Monday, December	Heather Leonard	0.1
12/1/2021	Dynamic - Key - Initial Disclosures [EM 10-12-2021] reviewed	Heather Leonard	0.1
12/1/2021	Dynamic - Key - Initial Disclosures - 000001 - 000038 reviewed	Heather Leonard	0.1
12/1/2021	Davita Key Pleading Comparison reviewed	Heather Leonard	0.1
12/1/2021	Matter admin	Heather Leonard	0.1
12/1/2021	First RFA, Interrogatories, and RPD to Dynamic - Draft created, then edited and reviewed	Heather Leonard	1.2
12/1/2021	Review and calendar dates from Uniform Scheduling Order (Doc. 51)	Heather Leonard	0.1
12/1/2021	Notes for Scheduling Conference reviewed	Heather Leonard	0.1
12/1/2021	List of Witnesses to Depose reviewed	Heather Leonard	0.2
11/30/2021	Finalize and send discovery responses to Defendant	Heather Leonard	2.5
11/30/2021	2 emails sent/reviewed regarding Key v HMMA - pleading comparison (due by 12/1)	Heather Leonard	0.1
11/30/2021	2 emails sent/reviewed regarding Documents	Heather Leonard	0.2
11/20/2021	1 email sent/reviewed regarding Key v HMMA - pleading comparison (due by 12/1)	Heather Leonard	0.1

11/20/2021	Notes for Scheduling Conference reviewed	Heather Leonard	0.7
11/19/2021	¶2 - ANSWER to 28 Amended Complaint by Hyundai Engineering America, Inc.. reviewed	Heather Leonard	0.1
11/19/2021	- First RFA, Interrogatories, and RPD to Def - Served 2021.11.19 created, then edited	Heather Leonard	0.3
11/19/2021	Dynamic - Key - Initial Disclosures [EM 10-12-2021] reviewed	Heather Leonard	0.1
11/19/2021	List of Witnesses to Depose created, then edited	Heather Leonard	0.5
11/19/2021	Notes for Scheduling Conference created	Heather Leonard	0.1
11/19/2021	2 emails sent/reviewed regarding Key Witnesses We May Want to Depose	Heather Leonard	0.1
11/19/2021	Doc. 46 - REPORT of Rule 26 f Planning Meeting reviewed	Heather Leonard	0.1
11/19/2021	's Answer and Defenses to Plaintiff's Amended Complaint ANSWER to 28 Amended Complaint reviewed	Heather Leonard	0.1
11/13/2021	1 email sent/reviewed regarding Your call	Heather Leonard	0.1
11/11/2021	1 email sent/reviewed regarding Your call	Heather Leonard	0.1
11/10/2021	reviewed regarding Attorney client communication - Key v. Hyundai - Discovery questions followup	Heather Leonard	0.1
11/9/2021	2 emails sent/reviewed regarding Your call	Heather Leonard	0.1
11/9/2021	ail sent/reviewed regarding Message For (7865749161:9131816) 2021-11-09 01:52PM	Heather Leonard	0.1
11/9/2021	1 email sent/reviewed regarding Mailroom position	Heather Leonard	0.1
11/4/2021	Motor Manufacturing Alabama, LLC, Hyundai Engineering America, Inc., and Dynamic Security, Inc. - Dis	Heather Leonard	0.1
11/4/2021	Email attachment reviewed - 2021-11-2 PL 1st Discovery to HMMA	Heather Leonard	0.1
11/4/2021	1 email sent/reviewed regarding Key v. HMMA et al	Heather Leonard	0.1
11/3/2021	Motor Manufacturing Alabama, LLC, Hyundai Engineering America, Inc., and Dynamic Security, Inc. - Dis	Heather Leonard	0.1
11/2/2021	igh client's file (paper and electronic on Smokeball) to try to answer the discovery requests	Heather Leonard	2
11/2/2021	ils sent/reviewed regarding For your review and revision - first draft of discovery to HMMA	Heather Leonard	0.1
11/2/2021	Form, No Footer created	Heather Leonard	0.1
11/2/2021	Discovery to HMMA - Draft for LP Review, Revision, and Service created, then edited	Heather Leonard	0.1
11/2/2021	Send Client Discovery Requests for Them to Answer	Heather Leonard	0.1
11/2/2021	i Motor Manufacturing Alabama, LLC, Hyundai Engineering America, Inc., and Dynamic Security, Inc. - Dis	Heather Leonard	0.1
11/2/2021	Def - Re production of insurance agreement - Ford Harrison, LLP reviewed	Heather Leonard	0.1
11/2/2021	1 email sent/reviewed regarding Davita Key v. HMMA, et al.	Heather Leonard	0.1
11/2/2021	Client - Re Defendant's Discovery Requests to Plaintiff created, then reviewed	Heather Leonard	0.1
11/2/2021	Notice to Take Deposition of Plf created	Heather Leonard	0.1
11/1/2021	Response to HMMA Discovery Due attended	Heather Leonard	0.5
10/15/2021	1 email sent/reviewed regarding Davita Key v. HMMA, et al.	Heather Leonard	0.1
10/13/2021	PL - Obj to HMMA Designations of Docs as Confidential.2021.10.12 reviewed	Heather Leonard	0.1
10/13/2021	Dynamic - Key - Initial Disclosures [EM 10-12-2021] reviewed	Heather Leonard	0.1

9/21/2021	4 emails sent/reviewed regarding Draft Rule 26 report in Key v HMMA	Heather Leonard	0.2
9/17/2021	1 email sent/reviewed regarding Draft Rule 26 report in Key v HMMA	Heather Leonard	0.1
9/17/2021	\, et al (https://us02web.zoom.us/j/87182868338?pwd=Mm5sMnVYbUdodUZ6QTJQb0YwTUluZz09&fron	Heather Leonard	0.5
9/17/2021	Rule 26 Report edited	Heather Leonard	1.3
9/15/2021	sent/reviewed regarding Key v. HMMA, et al. - Rule 26 report and proposed protective order	Heather Leonard	0.1
9/9/2021	sent/reviewed regarding Key v. HMMA, et al. - Rule 26 report and proposed protective order	Heather Leonard	0.1
9/8/2021	sent/reviewed regarding Key v. HMMA, et al. - Rule 26 report and proposed protective order	Heather Leonard	0.1
9/8/2021	Email attachment reviewed - Rule 26 Report	Heather Leonard	0.1
9/7/2021	sent/reviewed regarding Key v. HMMA, et al. - Rule 26 report and proposed protective order	Heather Leonard	0.1
9/1/2021	Review Doc. 40 - Order on When to Hold Rule 26 Conference	Heather Leonard	0.1
9/1/2021	Joint Motion for Protective Order - Draft 1 created, then edited	Heather Leonard	0.1
9/1/2021	sent/reviewed regarding Key v. HMMA, et al. - Rule 26 report and proposed protective order	Heather Leonard	0.1
9/1/2021	Privacy Protective Order - Draft 1 created, then edited	Heather Leonard	0.1
9/1/2021	sent/reviewed regarding Key v. HMMA - things for you to bless before I send to the defendants	Heather Leonard	0.1
9/1/2021	ewed regarding Automatic reply: Key v. HMMA, et al. - Rule 26 report and proposed protective order	Heather Leonard	0.1
9/1/2021	eviewed regarding [NELA-AL] : Middle District Order on MTD - Joint Employers and Dreadloc Hair	Heather Leonard	0.1
9/1/2021	Rule 26 Report created, then edited	Heather Leonard	1.2
9/1/2021	Def 2021.09.01 - Re Rule 26 planning conference created, then edited	Heather Leonard	0.3
9/1/2021	Doc. 39 - Notice of Correction reviewed	Heather Leonard	0.1
9/1/2021	1 email sent/reviewed regarding Natural Hair Discrimination	Heather Leonard	0.1
8/31/2021	Read Doc. 38 - Order and opinion on MTD	Heather Leonard	0.5
6/21/2021	1 email sent/reviewed regarding Beasley	Heather Leonard	0.1
4/5/2021	d regarding How hair discrimination impacts Black Americans in their personal lives and the workplace	Heather Leonard	0.1
11/24/2020	1 email sent/reviewed regarding Key v. Hyundai	Heather Leonard	0.1
7/17/2020	REV Review - Doc. 37 - HEA MTD Reply	Heather Leonard	0.2
7/15/2020	Doc. 35 - MTD Reply by HMMA reviewed	Heather Leonard	0.1
7/12/2020	Doc. 34 - Response to MTDs reviewed	Heather Leonard	0.1
7/8/2020	Doc. 34 - Response to MTDs reviewed	Heather Leonard	0.5
Email to L. Palmer re: response to MTD			
7/8/2020	1 email sent/reviewed regarding Key v. Hyundai - MTD R	Heather Leonard	0.1
7/8/2020	2 emails sent/reviewed regarding Key v Hyundai - resails with L. Palmer re: revisions to and filing c	Heather Leonard	0.1
7/8/2020	L - MTD Response V1 - 2020-07-07 - HNL Review created, thw and revise draft of response prepared by L. I	Heather Leonard	0.6

7/1/2020		1 email sent/reviewed regarding Key v. Hyundai, et. al	Heather Leonard	0.1
6/26/2020		2 emails sent/reviewed regarding Case	Heather Leonard	0.1
6/17/2020	REV	iew and Calendar - Doc. 33 - Briefing Order	Heather Leonard	0.1
6/17/2020		Doc. 33 - Briefing Order on MTDs reviewed	Heather Leonard	0.1
6/15/2020		Doc. 31 - MTD by HEA reviewed	Heather Leonard	0.3
6/15/2020		Doc. 32 - MTD by Dynamic reviewed	Heather Leonard	0.3
6/12/2020		1 email sent/reviewed regarding Key v. HMMA, HEA, Dynamic	Heather Leonard	0.1
6/2/2020		5 emails sent/reviewed regarding Key v. HMMA, HEA, Dynamic	Heather Leonard	0.2
6/2/2020		Def - Clarificatoin on Mootness of MTD created, then reviewed	Heather Leonard	0.1
6/2/2020	REV	Review -Doc. 29 - Order Mooting MTDs	Heather Leonard	0.1
6/1/2020		Doc. 23 - Motion to Amend reviewed	Heather Leonard	0.1
6/1/2020		Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Order on Motion	Heather Leonard	0.1
6/1/2020		1 email sent/reviewed regarding Key - Amended Complaint	Heather Leonard	0.1
6/1/2020	REV	c. 27 - Order Granting Motion to Amend Complaint	Heather Leonard	0.1
5/27/2020		ay in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Motions No L	Heather Leonard	0.1
5/26/2020		2 emails sent/reviewed regarding Natural Hair Discrimination	Heather Leonard	0.1
5/21/2020		1 email sent/reviewed regarding Natural Hair Discrimination	Heather Leonard	0.1
5/20/2020		Key v Hyundai Motor Manufacturing Alabama, LLC, et al. - do defendants oppose Plaintiff amending her co	Heather Leonard	0.1
5/20/2020		2 emails sent/reviewed regarding Key v Hyundai - motion to amend	Heather Leonard	0.1
5/20/2020		1 email sent/reviewed regarding Key v. Hyundai	Heather Leonard	0.1
5/20/2020		3 emails sent/reviewed regarding Discrimination - Discussion about cases finding discrimination re	Heather Leonard	0.1
5/20/2020		Notice of Appearance - Leslie Palmer created, then edited	Heather Leonard	0.1
5/20/2020		Notice of Appearance created, then edited and Notice of Appearance for Heather Leonard	Heather Leonard	0.1
5/20/2020		Amd Complaint - HNL Review created, then edited and made changes to the amended complaint pre	Heather Leonard	0.8
5/20/2020		LDF-Primer-on-Hair-Discrimination-Resources-FINAL created	Heather Leonard	0.1
5/20/2020		Motion to Amend Complaint reviewed posed changes; made a few changes myself;	Heather Leonard	0.2
5/19/2020		Doc. 11 - Hyndai Manufacturing MTD reviewed	Heather Leonard	0.3
5/19/2020	DRAFT	aft - PL - Response to Motions to Dismiss	Heather Leonard	2.4
5/19/2020	DRAFT	Draft - Motion to Amend Complaint	Heather Leonard	0.4
5/19/2020	COMM	e - sent email to defendants about motaasking defendants if they opposed the motion	Heather Leonard	0.1
5/19/2020	REV	Review and revise amended complaint prepared by Leslie Palmer; I reviewed and mad	Heather Leonard	0.8
5/19/2020		2 emails sent/reviewed regarding Hairstyle post	Heather Leonard	0.1
5/19/2020		1 email sent/reviewed regarding Hair discrimination	Heather Leonard	0.1

5/19/2020		Doc. 13 - Dynamic Security MTD reviewed	Heather Leonard	0.3
5/19/2020		1 email sent/reviewed regarding Discrimination - Mour for guidance on how to present the race	Heather Leonard	0.1
5/19/2020		email sent/reviewed regarding [NELA Discrimination] : Discr Richard Seymour on guidance of what to arg	Heather Leonard	0.1
5/19/2020		Doc. 8 - Hyundai Eng MTD reviewed	Heather Leonard	0.3
5/19/2020		2 emails sent/reviewed regarding Davita Key v. Hyundai et all	Heather Leonard	0.1
5/19/2020	COMM	Wendy Greene seeking guidance on nng her advice on how to best present the arg	Heather Leonard	0.1
5/19/2020	COMM	- email from David Milddlebrooks on m On behalf of HMMA, he opposes the motion	Heather Leonard	0.1
5/17/2020		1 email sent/reviewed regarding Hyundai Questions	Heather Leonard	0.1
5/17/2020		658782 created	Heather Leonard	0.1
5/17/2020		laim - Hyundai Motor Manufacturing Alabama, LLC Hyundai Engineering America, Inc. Dynamic Securi	Heather Leonard	0.3
5/17/2020		1 email sent/reviewed regarding Agreement for Representation - Signature required	Heather Leonard	0.2
5/17/2020		Contingency Fee Agreement - 2020 - joint with Leonard and Palmer created	Heather Leonard	0.1
5/17/2020		Signed Fee Agreement created	Heather Leonard	0.1
5/17/2020		Davila Key created	Heather Leonard	0.1
5/17/2020		Doc. 1 - Complaint reviewed	Heather Leonard	0.2
10/13/2022	CALL	Telephone Call be in touch. She broke down crying and ques	Jim Leonard	0.3
8/29/2022		Email attachment reviewed - Esquire 2022.08.29 Re paying bill for plaintiff depo	Jim Leonard	0.1
8/29/2022		1 email sent/reviewed regarding Please print	Jim Leonard	0.2

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,)
Plaintiff,)
)
v.) Civil Action No.
) 2:19-cv-767-ECM-SMD
)
DYNAMIC SECURITY, INC.,)
Defendant.)

**DECLARATION OF HEATHER LEONARD IN SUPPORT OF THE
PLAINTIFF'S MOTION FOR AN AWARD OF ATTORNEY'S FEES AND
EXPENSES**

Exhibit 3

6/5/2023	Email attachment reviewed - Mediation position statement	Heather Leonard	0.1
6/5/2023	2 emails sent/reviewed regarding Key v. Dynamic Security - mediation 6/9/2023 - Plaintiff's mediation position statement	Heather Leonard	0.1
6/5/2023	Mediation position statement created, then edited	Heather Leonard	2.2
6/5/2023	1 email sent/reviewed regarding Key v. HMA, HCA, and Dynamic - Notice Concerning Settlement and Mediation	Heather Leonard	0.1
6/5/2023	1 email sent/reviewed regarding Key v. HMA, HCA, and Dynamic - Notice Concerning Settlement and Mediation on request for injunctive relief [INNOV-WSACTNELL.P.FID1997338]	Heather Leonard	0.1
5/30/2023	Tray Prep Checklist reviewed	Heather Leonard	0.1
5/30/2023	Email attachment reviewed - Trial Prep Checklist	Heather Leonard	0.4
5/30/2023	1 email sent/reviewed regarding Key v. Dynamic - trial prep checklist	Heather Leonard	0.3
5/24/2023	1 email sent/reviewed regarding Case	Heather Leonard	0.1
5/23/2023	1 email sent/reviewed regarding Key article for appeal	Heather Leonard	0.1
5/23/2023	1 email sent/reviewed regarding mediation	Heather Leonard	0.1
5/11/2023	2 emails sent/reviewed regarding Key v. Dynamic Security Post-Trial / Pre-Appeal Mediation	Heather Leonard	0.1
5/10/2023	1 email sent/reviewed regarding Key v. Dynamic Security 2/19-v-00767-ECM	Heather Leonard	0.1
5/9/2023	1 email sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Order on Motion for Extension of Deadline	Heather Leonard	0.1
5/8/2023	2 emails sent/reviewed regarding Case	Heather Leonard	0.1
5/6/2023	1 email sent/reviewed regarding Key v. Dynamic Security Post-Trial motions and Rule 408 discussion on request for injunctive relief [INNOV-WSACTNELL.P.FID1997338]	Heather Leonard	0.1
5/3/2023	5 emails sent/reviewed regarding Key v. Dynamic Security Post-Trial motions and Rule 408 discussion on request for injunctive relief [INNOV-WSACTNELL.P.FID1997338]	Heather Leonard	0.1
5/2/2023	3 emails sent/reviewed regarding Key v. Dynamic Security Post-Trial motions and Rule 408 discussion on request for injunctive relief [INNOV-WSACTNELL.P.FID1997338]	Heather Leonard	0.1
5/1/2023	1 email sent/reviewed regarding Key v. Dynamic Security Post-Trial motions and Rule 408 discussion on request for injunctive relief [INNOV-WSACTNELL.P.FID1997338]	Heather Leonard	0.1
4/27/2023	2 emails sent/reviewed regarding That Help Please!	Heather Leonard	0.1
4/27/2023	Doc. 197 - MOTION for judgment as a Matter of Law Defendant Dynamic Security, Inc.'s Motion for Renewed Judgment as a Matter of Law as to Liability and Punitive Damages reviewed	Heather Leonard	0.1
4/27/2023	Review Doc. 197 - Renewed motion for judgment as a matter of law	Heather Leonard	0.1
4/27/2023	1 email sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Motion for Judgment as a Matter of Law	Heather Leonard	0.1
4/27/2023	Email attachment reviewed - Pl. Obj to Dynamic Exhibit List	Heather Leonard	0.1
4/26/2023	2 emails sent/reviewed regarding Case	Heather Leonard	0.1
4/26/2023	1 email sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Transcript	Heather Leonard	0.1
4/26/2023	1 email sent/reviewed regarding Law360 request for comment	Heather Leonard	0.3
4/25/2023	1 email sent/reviewed regarding Key v. Dynamic - Motion for Equitable Relief and Damages Calculation	Heather Leonard	0.1
4/25/2023	5 emails sent/reviewed regarding Big Congratulations!	Heather Leonard	0.1
4/24/2023	1 email sent/reviewed regarding Key equitable relief motion	Heather Leonard	0.1
4/24/2023	Pl. Obj to Proposed Jury Instructions reviewed	Heather Leonard	0.1
4/24/2023	Itemization of Copies reviewed	Heather Leonard	0.1
4/24/2023	Motion for Attorney's Fees edited	Heather Leonard	0.1
4/24/2023	Bills of Costs reviewed	Heather Leonard	0.1
4/24/2023	2 emails sent/reviewed regarding Big Congratulations!	Heather Leonard	0.1
4/19/2023	3 emails sent/reviewed regarding Dantek Key	Heather Leonard	0.3
4/18/2023	3 emails sent/reviewed regarding Key v. Dynamic Security - Post-trial motions and Rule 408 discussion on request for injunctive relief [INNOV-WSACTNELL.P.FID1997338]	Heather Leonard	0.1
4/18/2023	1 email sent/reviewed regarding Key - draft fee petition and fee deces for Candis, Sonya, and Ira	Heather Leonard	0.1
4/18/2023	1 email sent/reviewed regarding Scan from Home Office	Heather Leonard	0.1
4/18/2023	1 email sent/reviewed regarding Dantek Key	Heather Leonard	0.1
4/18/2023	Ex parte 2022-08-29 Re paying Bill for plaintiff's depo reviewed	Heather Leonard	0.1
4/18/2023	2 emails sent/reviewed regarding Key - Bill of Costs - transcripts	Heather Leonard	0.1
4/17/2023	Itemization of Deposition Transcripts and Copies created, then edited	Heather Leonard	0.1
4/17/2023	LEONARD, J-1304 reviewed	Heather Leonard	0.1
4/17/2023	Key - Time and Fees for Fee Petition reviewed	Heather Leonard	0.1
4/17/2023	1 email sent/reviewed regarding Key - Bill of Costs - transcripts	Heather Leonard	0.1
4/17/2023	1 email sent/reviewed regarding Key - Bill of Costs - transcripts	Heather Leonard	0.1
4/17/2023	Itemization of Deposition Transcripts and Copies created, then edited	Heather Leonard	0.1
4/17/2023	Motion for Attorney's Fees created, then edited	Heather Leonard	0.1
4/17/2023	Bill of Costs created, then edited	Heather Leonard	0.5
4/17/2023	4/17/2023	Heather Leonard	0.1
4/17/2023	Key - Time and Fees for Fee Petition created	Heather Leonard	0.1
4/17/2023	Itemization of Copies created	Heather Leonard	0.2
4/17/2023	2 emails sent/reviewed regarding Key - Bill of Costs - corrected chart to complete for depo invoices	Heather Leonard	0.1

3/26/2023	1 email sent/reviewed regarding Davita M. Key v. Hyundai Motor Manufacturing Alabama, LLC, et al., - Transcript for Gloria Robinson (3/20/2023)	Heather Leonard	0.1
3/26/2023	1 email sent/reviewed regarding Robinson designations	Heather Leonard	0.1
3/26/2023	PL - Verdict Form created, then edited	Heather Leonard	0.2
3/26/2023	19cv767-ECM Plaintiff's Exhibit List reviewed	Heather Leonard	0.1
3/26/2023	1 email sent/reviewed regarding Gloria Robinson transcript [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
3/26/2023	2 emails sent/reviewed regarding Key v Dynamic - Heather's notes on juror questionnaires	Heather Leonard	0.1
3/26/2023	Juror Notes - Pretrial edited and reviewed	Heather Leonard	1.9
3/25/2023	Binder1 - Jury Profiles w bookmarks reviewed	Heather Leonard	0.1
3/25/2023	Review Juror Profiles	Heather Leonard	4.1
3/25/2023	Juror Notes - Pretrial created, then edited	Heather Leonard	3.5
3/25/2023	Meeting with client to prepare her direct exam	Heather Leonard	1.6
3/24/2023	Comparison of Exhibit Lists - 3.21.23 reviewed	Heather Leonard	0.2
3/24/2023	Review Doc. 178 - Pretrial Order	Heather Leonard	0.1
3/24/2023	4 emails sent/reviewed regarding Key v Dynamic Security - opening [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
3/24/2023	Call among the parties' counsel to discuss admission of exhibits in advance of trial (Microsoft Teams Meeting) attended	Heather Leonard	0.5
3/23/2023	1 email sent/reviewed regarding Dynamic/Key: Defendants exhibit list and exhibits.	Heather Leonard	0.1
3/23/2023	1 email sent/reviewed regarding Key v Dynamic - trial subpoenas [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
3/23/2023	1 email sent/reviewed regarding Dynamic/Key: Defendants exhibit list and exhibits.	Heather Leonard	0.1
3/23/2023	82 MSI Opposition Brief reviewed	Heather Leonard	0.1
3/23/2023	1 email sent/reviewed regarding Dynamic/Key: Defendants exhibit list and exhibits.	Heather Leonard	0.1
3/23/2023	9 emails sent/reviewed regarding Key v Dynamic Security - Plaintiff's Trial Exhibits [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.3
3/23/2023	1 email sent/reviewed regarding Key v Dynamic Security - opening	Heather Leonard	0.1
3/23/2023	Pick up juror profiles in Key (One Church Street; Montgomery, AL 36104) attended	Heather Leonard	0.5
3/23/2023	1 email sent/reviewed regarding Dynamic/Key: Defendants exhibit list and exhibits.	Heather Leonard	0.1
3/23/2023	1 email sent/reviewed regarding Dynamic/Key: Defendants exhibit list and exhibits.	Heather Leonard	0.1
3/23/2023	1 email sent/reviewed regarding Dynamic/Key: Defendants exhibit list and exhibits.	Heather Leonard	0.1
3/23/2023	1 email sent/reviewed regarding Dynamic/Key: Defendants exhibit list and exhibits.	Heather Leonard	0.1
3/22/2023	Work on PowerPoint for opening statement	Heather Leonard	2.8
3/22/2023	Exhibit Notebook Cover Page created, then reviewed	Heather Leonard	0.3
3/21/2023	3 emails sent/reviewed regarding Key v Dynamic Security - px 17- dynamic security officer's handbook.pdf	Heather Leonard	0.2
3/21/2023	Pretrial Order - 2023.02.23 reviewed	Heather Leonard	0.2
3/21/2023	1 email sent/reviewed regarding Please pay process server for Cureton Service in Key (and scan and save the check to the billing folder in smokeball)	Heather Leonard	0.1
3/21/2023	Doc. 105 - Exhibit List Defendant Dynamic Security, Inc.'s Amended Exhibit List by Dynamic Security, Inc. reviewed	Heather Leonard	0.1
3/21/2023	px 30 - plaintiff's job application_redacted created	Heather Leonard	0.1
3/21/2023	Dx 41 - PL application for employment reviewed	Heather Leonard	0.1
3/21/2023	2 emails sent/reviewed regarding Cureton Witness Information	Heather Leonard	0.1
3/21/2023	1 email sent/reviewed regarding Key - Staples copy job	Heather Leonard	0.1
3/21/2023	Cureton ROS created	Heather Leonard	0.1
3/21/2023	px 17- dynamic security officer's handbook created	Heather Leonard	0.1
3/21/2023	Comparison of Exhibit Lists - 3.21.23 created, then edited and reviewed	Heather Leonard	0.6
3/21/2023	7 emails sent/reviewed regarding Subpoena to Serve in Montgomery	Heather Leonard	0.1
3/21/2023	Px 14 - August 30, 2017 Email from Cureton to Spires created	Heather Leonard	0.2
3/21/2023	1 email sent/reviewed regarding Key v Dynamic - updated exhibit list comparison	Heather Leonard	0.1
3/21/2023	1 email sent/reviewed regarding Key v Dynamic Security - Plaintiff's Trial Exhibits	Heather Leonard	0.2
3/21/2023	2 messages sent/reviewed	Heather Leonard	0.1
3/21/2023	19cv767-ECM Plaintiff's Exhibit List edited and reviewed	Heather Leonard	0.2
3/21/2023	Memo created - Cureton Contact Info	Heather Leonard	0.1
3/21/2023	Px 17- Dynamic Security Officer's Handbook created	Heather Leonard	0.2
3/21/2023	px 16- dynamic security paycheck_Redacted created	Heather Leonard	0.1
3/20/2023	Px 35- email 8.29.17 Spires, Cureton and other re unemployment rebuttal reviewed	Heather Leonard	0.1
3/20/2023	Px 40- Dynamic discipline guidelines reviewed	Heather Leonard	0.1
3/20/2023	Px 13 - August 29, 2017 Email from Spires to Cureton and Riddle created	Heather Leonard	0.1
3/20/2023	Px 23 - EEOC Charge_Redacted created	Heather Leonard	0.1
3/20/2023	Px 26- email 8.1.17 between Cureton, Spires and others re reason for removal reviewed	Heather Leonard	0.1
3/20/2023	Px 5- August 7, 2017 Email from Cureton to Spires_Redacted created	Heather Leonard	0.1
3/20/2023	Px 43- email 8.1.17 Cureton to Dynamic re Key Internal complaint reviewed	Heather Leonard	0.1
3/20/2023	Prep for depo - Gloria Robinson Trial Deposition Outline created, then edited	Heather Leonard	1.3
3/20/2023	Doc. 102 - PL Exhibit List reviewed	Heather Leonard	0.1

3/20/2023	Px-29- email Dynamic transmittal to HR with Complaint reviewed	Heather Leonard	0.1
3/20/2023	Px-51- Robinson employment discipline and complaints reviewed	Heather Leonard	0.1
3/20/2023	Lester's trial exhibit list reviewed	Heather Leonard	0.1
3/20/2023	Px-32- email 8.11.17 Spipes, Cureton and others re EEOC response reviewed	Heather Leonard	0.1
3/20/2023	Px-25- email 8.7.17 between Cureton, Spipes and other notifying of threats to sue reviewed	Heather Leonard	0.1
3/20/2023	Px-33- email 8.11.17 Spipes, Cureton and others concerning work verification of key reviewed	Heather Leonard	0.1
3/20/2023	1 email sent/reviewed regarding Key Dynamic - Exhibit List Chart for the C-Court for trial	Heather Leonard	0.1
3/20/2023	Px-44- email 8.28.17 pt Cureton, Spipes and others re Key complaint status reviewed	Heather Leonard	0.1
3/20/2023	2 messages sent/reviewed	Heather Leonard	0.1
3/20/2023	Px-39- Dynamic rules and regulations reviewed	Heather Leonard	0.1
3/20/2023	Px-24- Latonya Howel statement reviewed	Heather Leonard	0.1
	Deposition of Gloria Robinson		
3/20/2023	Px-15- 09-10 2017 email bt Robinson, Baxter, Williams re styled hair reviewed	Heather Leonard	0.1
3/20/2023	3 emails sent/reviewed regarding Nicole Scavella and Rule 408 Discussion	Heather Leonard	0.1
3/20/2023	1 email sent/reviewed regarding Key v. Dynamic - updated/corrected exhibit list	Heather Leonard	0.1
3/20/2023	18cV767-ECM Plaintiff's Exhibit List edited	Heather Leonard	0.1
3/20/2023	Px-41- Dynamic harassment policy reviewed	Heather Leonard	0.1
3/20/2023	Px-16- email 8.2-27 bt Cureton, Robinson, others saying Key not to return reviewed	Heather Leonard	0.1
3/20/2023	Px-20- email 8.8.17 email bt Cureton, Spipes and others with Key complaint reviewed	Heather Leonard	0.1
3/20/2023	Px-19- Dynamic statements re Key 8.8.17 reviewed	Heather Leonard	0.1
3/20/2023	Px-26- Job Search Emails created	Heather Leonard	0.1
3/20/2023	Px-11- email bt Robinson and Key re interview time reviewed	Heather Leonard	0.1
3/20/2023	Px-27- email 8.1.17 Cureton, Williams and others reviewed	Heather Leonard	0.1
3/20/2023	Px-5- App Standards for security personnel reviewed	Heather Leonard	0.1
3/20/2023	Px-34- email 8.22.17 Spipes, Cureton and others re unemployment reviewed	Heather Leonard	0.1
3/19/2023	1 email sent/reviewed regarding 21-19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc.	Heather Leonard	0.1
3/19/2023	1 email sent/reviewed regarding Davita outline	Heather Leonard	0.1
3/19/2023	1 email sent/reviewed regarding Key v. Dynamic Security - possible plaintiff prep	Heather Leonard	0.1
3/19/2023	1 email sent/reviewed regarding Dynamic - Key [NWV-WRACTIVELLP.FID1997338]	Heather Leonard	0.1
3/18/2023	Review Doc. 175- Notice of Availability of Juror Profiles	Heather Leonard	0.1
3/18/2023	Dynamic - Key Initial Disclosures - 000001 - 00000381 reviewed	Heather Leonard	0.1
3/18/2023	Key v. Dynamic - Attorney Trial Prep Meeting 2 [Microsoft Teams Meeting] attended	Heather Leonard	0.1
3/18/2023	Doc. 175 - Notice of Availability of Juror Profiles reviewed	Heather Leonard	0.1
3/16/2023	Subpoena to Kristal Riddle edited	Heather Leonard	0.1
3/16/2023	Doc. 102 - Pl. Exhibit list reviewed	Heather Leonard	0.1
3/16/2023	Subpoena to Sherry Spipes edited	Heather Leonard	0.1
3/16/2023	1 email sent/reviewed regarding Dynamic - Key	Heather Leonard	0.1
3/16/2023	Letter to Fort Harrison, LLP re trial subpoenas created, then edited and reviewed	Heather Leonard	0.1
3/16/2023	1 email sent/reviewed regarding 21-19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc.	Heather Leonard	0.1
3/16/2023	Exhibit List for Court created, then edited and reviewed	Heather Leonard	0.1
3/16/2023	1 email sent/reviewed regarding Key v. Dynamic Security - Trial Subpoenas	Heather Leonard	0.1
3/15/2023	6 emails sent/reviewed regarding Subpoena to Serve in Montgomery	Heather Leonard	0.1
3/15/2023	Meeting with client to prepare her trial testimony	Heather Leonard	0.1
3/15/2023	Subpoena to Ray Cureton edited	Heather Leonard	0.1
3/15/2023	1 email sent/reviewed regarding Hotel Room for Key	Heather Leonard	0.1
3/15/2023	1 email sent/reviewed regarding Reservation Confirmation #8472778 for SpringHill Suites Montgomery Downtown	Heather Leonard	0.1
3/15/2023	Key Plaintiff Prep Meeting One [Microsoft Teams Meeting] attended	Heather Leonard	0.1
3/15/2023	1 email sent/reviewed regarding Please prepare these two witness fee checks and bring to Heather	Heather Leonard	0.1
3/15/2023	Witness re trial subpoena process server letter - Ray Cureton created, then edited	Heather Leonard	0.1
3/15/2023	Subpoena to Sherry Spipes reviewed	Heather Leonard	0.1
3/15/2023	Letter to Charlotte Henderson re service of process created, then edited	Heather Leonard	0.1
3/15/2023	Defendant Dynamic Security, Inc.'s Witness List [unredacted] - 01-26-2023 reviewed	Heather Leonard	0.1
3/14/2023	4 emails sent/reviewed regarding Dynamic - Key	Heather Leonard	0.1
3/14/2023	5 emails sent/reviewed regarding Dynamic - Key - Letter to Palmer Leonard re Trial Subp. EM-03-14-2023 [NWV-WRACTIVELLP.FID1997338]	Heather Leonard	0.3
3/13/2023	1 email sent/reviewed regarding Notices of Trial Deposition [NWV-WRACTIVELLP.FID1997338]	Heather Leonard	0.1
3/13/2023	Subpoena to Ray Cureton edited	Heather Leonard	0.2
3/13/2023	Witness Fee Checks created, then edited and reviewed	Heather Leonard	0.3

3/13/2023	Witness re trial subpoena - Ray Cureton created	Heather Leonard
3/8/2023	Doc. 174 - Order Denying Intercutory Appeal	Heather Leonard
3/8/2023	Doc. 170 - RESPONSE in Opposition re [158] Third MOTION in Limine Defendant Dynamic Security, Inc.'s reviewed	Heather Leonard
3/8/2023	Doc. 172 - RESPONSE in Opposition re [160] Fifth MOTION in Limine Defendant's Fifth Motion In Limine reviewed	Heather Leonard
3/8/2023	2 emails sent/reviewed regarding Key v Dynamic - trial subpoenas and Rule 408 settlement discussions [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard
3/8/2023	Review Doc. 166 - Dynamic's response to PL 2nd MIL - Dismissed Claims	Heather Leonard
3/8/2023	Key Attorney Trial Prep Meeting #1 (Microsoft Teams Meeting) attended	Heather Leonard
3/8/2023	Doc. 171 - RESPONSE in Opposition re [158] Fourth MOTION in Limine Defendant Dynamic Security, Inc.'s reviewed	Heather Leonard
3/8/2023	Doc. 164 - RESPONSE in Opposition re [157] Second MOTION in Limine Defendant Dynamic Security, reviewed	Heather Leonard
3/8/2023	1 email sent/reviewed regarding Key v Dynamic - trial subpoenas [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard
3/8/2023	Review Doc. 167 - Dynamic's response to PL 3rd MIL - EEOC Determination	Heather Leonard
3/8/2023	Doc. 169 - RESPONSE in Opposition re [156] First MOTION in Limine Defendant Dynamic Security, Inc.'s First Motion In Limine to Exclude Plaintiff's reviewed	Heather Leonard
3/8/2023	Review Doc. 168 - Dynamic Response to PL 4th MIL - DOL Finding	Heather Leonard
3/8/2023	Review Doc. 165 - Dynamic's Response to PL 1st MIL - Cureton as a Minister	Heather Leonard
3/7/2023	Review Doc. 164 - Motion to Certify Interlocutory Appeal	Heather Leonard
3/7/2023	4 emails sent/reviewed regarding KEY - Draft resp to 1st mil	Heather Leonard
3/7/2023	Doc. 157 - Second MOTION in Limine Defendant Dynamic Security, Inc.'s Second Motion in Limine reviewed	Heather Leonard
3/7/2023	Doc. 28 - Amended Complaint reviewed	Heather Leonard
3/7/2023	Email attachment reviewed - PL Resp- 1st MIL Koreans	Heather Leonard
3/7/2023	3 internal messages sent/reviewed	Heather Leonard
3/7/2023	PL Obj to Proposed Jury Instructions reviewed	Heather Leonard
3/7/2023	2 emails sent/reviewed regarding Key - Obj to jury Instruction	Heather Leonard
3/7/2023	Doc. 75-27 - Deposition Transcript of Dynamic - Spires reviewed	Heather Leonard
3/7/2023	Response to Motion in Limine - Second created, then edited and reviewed	Heather Leonard
3/7/2023	Px 19- Dynamic position statement reviewed	Heather Leonard
3/6/2023	2 emails sent/reviewed regarding Key v Dynamic - trial subpoenas and Rule 408 settlement discussions [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard
3/6/2023	PL - 2nd MIL - Dismissed Claims reviewed	Heather Leonard
3/1/2023	Subsequent Employment Chart created, then edited	Heather Leonard
3/1/2023	4 emails sent/reviewed regarding Key v Dynamic - trial subpoenas [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard
3/1/2023	2 emails sent/reviewed regarding Key v Dynamic Security - settlement communicalton	Heather Leonard
3/1/2023	PL - Obj to Def Dynamic Voir Dire created, then edited and reviewed	Heather Leonard
3/1/2023	PL - Obj to Def Dynamic Voir Dire created	Heather Leonard
3/1/2023	1 email sent/reviewed regarding Key v Dynamic - trial subpoenas	Heather Leonard
3/1/2023	Trial Prep Checklist created, then edited	Heather Leonard
3/1/2023	2 emails sent/reviewed regarding Key v Dynamic - trial prep checklist	Heather Leonard
3/1/2023	Trial Preparation Meeting with Leslie Worked on trial themes, review and culling of exhibits for trial and preparing timeline demonstrative	Heather Leonard
3/1/2023	1 email sent/reviewed regarding Case Information	Heather Leonard
3/1/2023	Damages Worksheet for Client to Fill Out created	Heather Leonard
3/1/2023	Doc. 154 - Proposed Voir Dire by Davita M. Key reviewed	Heather Leonard
3/1/2023	Doc. 155 - Defendant's Voir Dire reviewed	Heather Leonard
3/1/2023	2 emails sent/reviewed regarding Key v Dynamic - trial preparation on injuries (please return worksheets by March 8)	Heather Leonard
3/1/2023	1 email sent/reviewed regarding [NELA Open Forum] : Voir Dire Question Suggesting Discrimination against Union Membership	Heather Leonard
3/1/2023	2 emails sent/reviewed regarding Key v Dynamic Security - settlement communicalton [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard
3/1/2023	4 emails sent/reviewed regarding Signed Copy	Heather Leonard
2/28/2023	Review Doc. 155 - Defendant's Voir Dire	Heather Leonard
2/28/2023	2 emails sent/reviewed regarding Key v Dynamic - trial subpoena for Carolyn Williams	Heather Leonard
2/27/2023	PL - Obj to HMMA Witness and Exhibit List reviewed	Heather Leonard
2/27/2023	6 emails sent/reviewed regarding Jennifer Wheeler	Heather Leonard
2/27/2023	PL - Obj to HMMA Depostion Designations reviewed	Heather Leonard
2/24/2023	PL - Jury Charges - filed 2023.02.24 created	Heather Leonard
2/24/2023	Dx 61- 7.27.16 letter of extension of contract reviewed	Heather Leonard
2/24/2023	1 email sent/reviewed regarding Key - MIL Cureton Preacher Man	Heather Leonard
2/24/2023	1 email sent/reviewed regarding 2:19-cv-767-ECH-SMD; Key v Dynamic Security - Plaintiff's Proposed Jury Charges	Heather Leonard
2/24/2023	PL - Proposed Voir Dire created, then edited	Heather Leonard
2/24/2023	3 emails sent/reviewed regarding Key v Dynamic - 1st MIL - Cureton as minister	Heather Leonard
2/24/2023	1 email sent/reviewed regarding Proposed voir dire	Heather Leonard
2/24/2023	PL - 4th MIL - Unemployment Determination created, then edited	Heather Leonard
2/24/2023	1 email sent/reviewed regarding Key v Dynamic - Plaintiff's Second Motion in Limine - Dismissed Claims (for your review, revision)	Heather Leonard
2/24/2023	1 email sent/reviewed regarding Key v Dynamic - 4th MIL on Unemployment Finding	Heather Leonard

2/24/2023	Pl - Jury Charges - filed 2023-02-24 created, then edited and reviewed	Heather Leonard
Pl - 3rd MIL - EEOC Filing created, then edited and reviewed	Heather Leonard	
2 emails sent/reviewed regarding Key v Dynamic Security - Third MIL - EEOC Filing	Heather Leonard	
1 email sent/reviewed regarding Key v Dynamic Security - Third MIL - EEOC Filing	Heather Leonard	
Pl - 2nd MIL - Dismissed Claims created, then edited	Heather Leonard	
1 email sent/reviewed regarding 2:19-cv-00767-ECH-SMD - Key v Dynamic - Revised Pretrial Order	Heather Leonard	
2 emails sent/reviewed regarding Key v Dynamic - draft jury charges for your review	Heather Leonard	
3 emails sent/reviewed regarding Key v Dynamic Security - framing of decision to remove Key from Hyundai [NW0V-W5ACTNELL.P.D199733]	Heather Leonard	
2 emails sent/reviewed regarding 2:19-cv-00767-ECH-SMD - Key v Dynamic Security - revised pretrial order	Heather Leonard	
3 emails sent/reviewed regarding Key v Dynamic Security - framing of decision to remove Key from Hyundai [NW0V-W5ACTNELL.P.D199733]	Heather Leonard	
1 email sent/reviewed regarding Key v Dynamic Trial witness subpoenas	Heather Leonard	
1 email sent/reviewed regarding Key v Dynamic - draft jury charges for your review	Heather Leonard	
Pl - Jury Charges created, then edited	Heather Leonard	
Pretrial Order - 2023-02-23 edited	Heather Leonard	
1 email sent/reviewed regarding Key v Dynamic Security - framing of decision to remove Key from Hyundai	Heather Leonard	
Pretrial Order - 2023-02-22 created, then edited	Heather Leonard	
1 email sent/reviewed regarding Key v Dynamic Security - revised pretrial order	Heather Leonard	
1 email sent/reviewed regarding Pattern Jury Instructions - Civil	Heather Leonard	
1 email sent/reviewed regarding Pattern Jury Instructions - Civil	Heather Leonard	
Pl - Jury Charges created, then edited	Heather Leonard	
Review Doc. 147 - Order on jury trial, extension, and reconsideration	Heather Leonard	
Prepare for pretrial conference - review proposed pretrial order, briefs of jury trial issue, calendar for potential time conflicts	Heather Leonard	
Prelim conference	Heather Leonard	
Review Doc. 138 - NSI Opinion	Heather Leonard	
2 emails sent/reviewed regarding Key v Dynamic - Rest to Depo designation objections	Heather Leonard	
Pl - Resp to Dynamic Depo Obj - HL Review created, then edited	Heather Leonard	
1 email sent/reviewed regarding Key v HIMA	Heather Leonard	
1 email sent/reviewed regarding Key - Options	Heather Leonard	
4 emails sent/reviewed regarding Key v HIMA et al - version 4 of the pretrial order	Heather Leonard	
3 emails sent/reviewed regarding Key v HIMA et al - version 4 of the pretrial order	Heather Leonard	
Pretrial Order - 2023-02-10 - Version 5 created, then reviewed	Heather Leonard	
Email attachment reviewed - 757286	Heather Leonard	
Email attachment reviewed - Pretrial Order - 2023-02-10 - Version 5	Heather Leonard	
1 email sent/reviewed regarding Key v HIMA - HEA, Dynamic (2:19-cv-767-ECH-SMD) - pretrial order	Heather Leonard	
1 email sent/reviewed regarding HIMA - our objections to Key and Burns Depo Designations	Heather Leonard	
Review Doc. 132 - Dynamic's Obj to HIMA's Exhibit List	Heather Leonard	
1 email sent/reviewed regarding Key v HIMA - comparison of exhibit lists	Heather Leonard	
Pl - Obj to Dynamic Exhibit List edited and reviewed	Heather Leonard	
1 email sent/reviewed regarding Key v HIMA et al - version 4 of the pretrial order	Heather Leonard	
Comparison of Exhibit lists reviewed	Heather Leonard	
Review Doc. 131 - Dynamic's Obj to HEA Exhibit List	Heather Leonard	
82 NSI Opposition Brief reviewed	Heather Leonard	
Review Doc. 133 - Dynamic's Obj to Pl. Exhibit List	Heather Leonard	
Review Doc. 130 - Dynamic's Obj to Depo Designations	Heather Leonard	
82 NSI Opposition Brief reviewed	Heather Leonard	
Review Doc. 134 - Dynamic's Objections to Plaintiff's Witness List	Heather Leonard	
1 email sent/reviewed regarding Key - Exhibit list comparison	Heather Leonard	
Email attachment reviewed	Heather Leonard	
Pl - Obj to Dynamic Exhibit List edited	Heather Leonard	
Dr - 1st amended complaint reviewed	Heather Leonard	
Pl - Obj to Dynamic Exhibit List edited	Heather Leonard	
1 email sent/reviewed regarding Key v HIMA, et al - Objections to Dynamic's exhibit list for your review, revision, and filing	Heather Leonard	
Pl - Obj to Dynamic Exhibit List edited	Heather Leonard	
2 emails sent/reviewed regarding Key v HIMA, et al - Objections to Dynamic's exhibit list for your review, revision, and filing	Heather Leonard	
Pl - Obj to Dynamic Exhibit List edited	Heather Leonard	
Dr - 1st amended complaint reviewed	Heather Leonard	
Pl - Obj to Dynamic Exhibit List edited	Heather Leonard	
1 email sent/reviewed regarding Key v HIMA (As Amended) by Hyundai Motor Manufacturing Alabama, LLC reviewed	Heather Leonard	
Doc. 116 - Exhibit List (As Amended) by Hyundai Motor Manufacturing Alabama, LLC reviewed	Heather Leonard	
1 email sent/reviewed regarding Key v HIMA - REVERSED AND UPDATED objections to HIMA witness's exhibit list for your review, revision, and filing	Heather Leonard	
Dr. 33 - individual employee schedule for Dilson reviewed	Heather Leonard	
1 email sent/reviewed regarding errata	Heather Leonard	

2/7/2023	Dx 15- ack of Dynamic officer manual reviewed	Heather Leonard	0.1
2/7/2023	Doc. 105 - Exhibit List Defendant Dynamic Security, Inc.'s Amended Exhibit List by Dynamic Security, Inc. reviewed	Heather Leonard	0.2
2/7/2023	Comparison of Exhibit Lists reviewed	Heather Leonard	0.1
2/7/2023	1 email sent/reviewed regarding Case	Heather Leonard	0.1
2/7/2023	1 email sent/reviewed regarding (no subject)	Heather Leonard	0.1
2/7/2023	1 email sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Order to Show Cause	Heather Leonard	0.1
2/7/2023	3 emails sent/reviewed regarding Key v HMMA et al - version 4 of the pretrial order	Heather Leonard	0.1
2/7/2023	Doc. 111 - MOTION for Leave to File - Defendant Hyundai ENG America, Inc.'s Motion for Leave to Amend its Trial Exhibit List by Hyundai E reviewed	Heather Leonard	0.1
2/7/2023	1 email sent/reviewed regarding Key - Exhibit list comparison	Heather Leonard	0.1
2/7/2023	Dx 12 - PL resp to Dynamic RFA created	Heather Leonard	0.1
2/7/2023	PL - Response to Show Cause - 2022.02.07 created, then edited	Heather Leonard	0.1
2/7/2023	1 email sent/reviewed regarding Key- exhibits I can't find	Heather Leonard	0.1
2/7/2023	Dx 7 - Key Kelly services pay records created	Heather Leonard	0.1
2/7/2023	Dx 24- letter of intent reviewed	Heather Leonard	0.1
2/7/2023	Doc. 102 - PL Exhibit List reviewed	Heather Leonard	0.1
2/7/2023	Dx 22 - rebuttal from PL to eeoc re Dynamic position statement reviewed	Heather Leonard	0.1
2/7/2023	PL - Obj to Dynamic Exhibit List created, then edited	Heather Leonard	1.4
2/3/2023	1 email sent/reviewed regarding Key v HMMA et al - version 4 of the pretrial order	Heather Leonard	0.1
2/3/2023	Review Doc. 108 - Order to Show Cause	Heather Leonard	0.1
2/3/2023	PL - Response to Show Cause created, then edited	Heather Leonard	0.1
2/3/2023	Doc. 107 - MOTION for Leave to File Amended Exhibit List by Hyundai Motor Manufacturing Alabama, LLC reviewed	Heather Leonard	0.1
2/2/2023	1 email sent/reviewed regarding Key - exhibits I can't find	Heather Leonard	0.1
2/1/2023	1 email sent/reviewed regarding Key v HMMA, HEA, Dynamic - leave to file amended exhibit list	Heather Leonard	0.1
2/1/2023	1 email sent/reviewed regarding Case	Heather Leonard	0.1
1/30/2023	2 emails sent/reviewed regarding Key- exhibits I can't find	Heather Leonard	0.3
1/30/2023	3 emails sent/reviewed regarding Case	Heather Leonard	0.1
1/30/2023	1 email sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Order	Heather Leonard	0.1
1/30/2023	1 email sent/reviewed regarding Key v. Hyundai Motor Manufacturing Alabama, LLC Amended Exhibit List	Heather Leonard	0.1
1/27/2023	Review Doc. 103 - Reply on Motion to Strike Jury Demand	Heather Leonard	0.3
1/27/2023	Review Doc. 99 - Dynamic Exhibit List	Heather Leonard	0.1
1/27/2023	1 email sent/reviewed regarding Key - Plaintiff's Trial Exhibits	Heather Leonard	0.1
1/27/2023	1 email sent/reviewed regarding Davita Key v. Dynamic Security, Inc.	Heather Leonard	0.1
1/27/2023	1 email sent/reviewed regarding Key v HMMA, HEA, Dynamic 2:19-cv-00767-ECM-SMD - Plaintiff Witness List - Unredacted	Heather Leonard	0.1
1/27/2023	3 emails sent/reviewed regarding D. Key v. HMMA, et al.	Heather Leonard	0.1
1/27/2023	1 email sent/reviewed regarding Key - Pretrial Documents	Heather Leonard	0.1
1/27/2023	Review Doc. 98 - Dynamic Witness List	Heather Leonard	0.1
1/27/2023	2 emails sent/reviewed regarding Key - Dynamic Trial Exhibits	Heather Leonard	0.2
1/27/2023	Comparison of Exhibit Lists created, then edited	Heather Leonard	1.1
1/27/2023	Doc. 102 - PL Exhibit List reviewed	Heather Leonard	0.1
1/27/2023	Template - Subpoena to created, then edited	Heather Leonard	0.1
1/27/2023	Review Doc. 100 - Dynamic Depo Designation	Heather Leonard	0.1
1/27/2023	Review Doc. 104 - Motion to continue pretrial conference	Heather Leonard	0.1
1/27/2023	1 email sent/reviewed regarding Key, Davita - HEA Trial Exhibits	Heather Leonard	0.1
1/27/2023	5 emails sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Order	Heather Leonard	0.1
1/26/2023	Review Doc. 92 - Order moving pretrial conference	Heather Leonard	0.1
1/25/2023	2 emails sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Order	Heather Leonard	0.1
1/24/2023	Call among parties re: pretrial order	Heather Leonard	0.3
1/24/2023	Call with Allison Ingram re; March 27 trial setting (Pettaway v Montgomery/Finley is her case)	Heather Leonard	0.2
1/24/2023	2 emails sent/reviewed regarding Pettaway v Finley Trial Setting March 27 (Key v HMMA/HEA/Dynamic)	Heather Leonard	0.2
1/24/2023	2 emails sent/reviewed regarding Key v HMMA, HEA, Dynamic - pretrial order - version two	Heather Leonard	0.1
1/24/2023	1 email sent/reviewed regarding Key v HMMA, HEA, and Dynamic - pretrial order	Heather Leonard	0.1
1/24/2023	Pretrial Order- 2023.01.24 - Version 4 created, then edited	Heather Leonard	0.5
1/23/2023	1 email sent/reviewed regarding Key v HMMA, HEA, Dynamic - pretrial order - version two	Heather Leonard	0.1
1/23/2023	1 email sent/reviewed regarding Key v HMMA, HEA, and Dynamic - pretrial order	Heather Leonard	0.1
1/23/2023	1 message sent/reviewed	Heather Leonard	0.1
1/23/2023	Pretrial Order- 2023.01.23 - Version 3 created, then edited and reviewed	Heather Leonard	1.7
1/19/2023	1 email sent/reviewed regarding KEY v HMMA, HEA and Dynamic Security	Heather Leonard	0.1
1/19/2023	Revised PTO by WRB reviewed	Heather Leonard	0.1
1/19/2023	Pretrial Order- 2023.01.19 - Version 2 created, then edited and reviewed	Heather Leonard	2.1

11/19/2023	Response to Motion to Strike Due attended	Heather Leonard
11/19/2023	3 emails sent/reviewed regarding Key v HIMA, HEA, Dynamic - pretrial order - version two	Heather Leonard
11/19/2023	1 email sent/reviewed regarding Conference ID reservation**	Heather Leonard
11/18/2023	1 email sent/reviewed regarding KEY v HIMA, HEA and Dynamic Security [IWWV-WSACTIVEFLP.FID1997338]	Heather Leonard
11/18/2023	Response to Motion to Strike - HL Review created, then edited	Heather Leonard
11/18/2023	Def - Dynamic Response to RFA, RPD, and Interrogatories reviewed	Heather Leonard
Doc. 89 - Ex. 1 - Handbook - MOTION to Strike Plaintiff's Demand for Jury Trial by Dynamic Security, Inc.. reviewed	Heather Leonard	
11/18/2023	1 email sent/reviewed regarding KEY v HIMA, HEA and Dynamic Security	Heather Leonard
11/18/2023	1 email sent/reviewed regarding KEY v HIMA, HEA and Dynamic Security [IWWV-WSACTIVEFLP.FID1997338]	Heather Leonard
11/18/2023	1 email sent/reviewed regarding Key v HIMA, HEA - Resp to Dynamic Jury Strike Motion	Heather Leonard
8044773 Dariia, M Key DEFENDANT EXHIBIT10 reviewed	Heather Leonard	
11/18/2023	2 emails sent/reviewed regarding KEY v HIMA, HEA and Dynamic Security	Heather Leonard
11/17/2023	3 emails sent/reviewed regarding Key v HIMA, HEA and Dynamic Security	Heather Leonard
11/17/2023	3 emails sent/reviewed regarding Key v HIMA, HEA - sample witness list	Heather Leonard
11/17/2023	Draft and circulate pretrial order (Due 1/19)	Heather Leonard
11/9/2023	2 emails sent/reviewed regarding Case	Heather Leonard
11/8/2023	Prelim Order - Jurge Marts created, then edited	Heather Leonard
11/8/2023	92 MSI Opposition Brief reviewed	Heather Leonard
Review Doc. 90 - Show Cause on Motion to Strike Jury Demand	Heather Leonard	
11/8/2023	1 internal message sent/reviewed	Heather Leonard
11/9/2023	1 email sent/reviewed regarding Key v HIMA, pretrial order - very rough draft 1	Heather Leonard
11/9/2023	1 email sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Order	Heather Leonard
11/5/2023	1 message sent/reviewed	Heather Leonard
11/5/2023	1 email sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Motion to Strike	Heather Leonard
11/2/2022	2 emails sent/reviewed regarding Case	Heather Leonard
Doc. 88 - Dynamic motion to strike reviewed	Heather Leonard	
Review Doc. 87 Reply Brief	Heather Leonard	
Review Doc. 88 Motion to Strike	Heather Leonard	
11/1/2022	1 email sent/reviewed regarding HIMA Deposition of Robert Buins	Heather Leonard
11/1/2022	1 email sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al - Word version of Reply Brief of HIMA in Support of its Motion for Summary Judgment	Heather Leonard
Doc. 85 - REPLY BRIEF in Response to Plaintiff's Brief filed by Hyundai reviewed	Heather Leonard	
11/1/2022	1 email sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Motion for Extension of Time to File Response/Reply	Heather Leonard
Doc. 85 - BRIEF/MEMORANDUM In Opposition re [s]e] Evidence/Summary Submission reviewed	Heather Leonard	
Doc. 86 - REPLY BRIEF reviewed	Heather Leonard	
11/1/2022	1 email sent/reviewed regarding Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al - Word version of Reply Brief of Hyundai ENG America, Inc. in Support of its Motion for Summary Judgment	Heather Leonard
Email attachment reviewed - MSI RESPONSE 12 - Heather Pass	Heather Leonard	
11/1/2022	1 email sent/reviewed regarding Key Brief so far	Heather Leonard
Review Doc. 83 - Dynamic's motion for an extension to respond to SJ	Heather Leonard	
11/1/2022	1 message sent/reviewed	Heather Leonard
Dynamic - Key Production - 000049-000092 reviewed	Heather Leonard	
Ex.47 - Mailroom Pay Issues reviewed	Heather Leonard	
Doc. 70 - MSI Brief for HEA reviewed	Heather Leonard	
8044773 Dariia, M Key DEFENDANT EXHIBIT9 reviewed	Heather Leonard	
Ex. 50 Scattella reviewed	Heather Leonard	
11/3/2022	Ex 14 - FCC Position Statement reviewed	Heather Leonard
11/3/2022	Exhibit 39 reviewed	Heather Leonard
11/3/2022	1 email sent/reviewed regarding conclusion	Heather Leonard
Ex. 59 Dynamic Unverified Discovery Responses reviewed	Heather Leonard	
11/3/2022	Ex 22 Charge Email reviewed	Heather Leonard
11/3/2022	Work on MSI Response Brief	Heather Leonard
11/3/2022	Ex 23 Charge Email reviewed	Heather Leonard
11/3/2022	Exhibit 36 reviewed	Heather Leonard
11/3/2022	MSU Response - Evidenceary Materials created, then edited	Heather Leonard
Ex 16 - Response to Finding reviewed	Heather Leonard	
Williams PX-65 reviewed	Heather Leonard	
11/3/2022	Exhibit 38 reviewed	Heather Leonard
Ex 12 - Notice of Charge reviewed	Heather Leonard	
8044773 Dariia, M Key DEFENDANT EXHIBIT12 reviewed	Heather Leonard	

11/3/2022	Conclusion for SJ created, then edited	Heather Leonard	0.6
11/2/2022	Doc. 68-14 - Exhibit 13 - Declaration of C. Williams reviewed	Heather Leonard	0.1
11/2/2022	Exhibit 36 reviewed	Heather Leonard	0.1
11/2/2022	1 email sent/reviewed regarding Draft Declaration - DO NOT SIGN JUST REVIEW	Heather Leonard	0.1
11/2/2022	1 email sent/reviewed regarding Key Brief so far	Heather Leonard	0.1
11/2/2022	Williams PX-61 reviewed	Heather Leonard	0.1
11/2/2022	Exhibit 39 reviewed	Heather Leonard	0.1
11/2/2022	Exhibit 41 reviewed	Heather Leonard	0.1
11/2/2022	MSJ RESPONSE V2 - Heather Pass created, then edited	Heather Leonard	6.7
11/2/2022	Key 000131 - Key 000248 Redacted reviewed	Heather Leonard	0.1
11/2/2022	1 email sent/reviewed regarding Great job on this	Heather Leonard	0.1
11/2/2022	SJ Brief fact check chart reviewed	Heather Leonard	0.1
11/2/2022	8044773 Key.Davita M. 062022.full reviewed	Heather Leonard	0.2
11/2/2022	1 email sent/reviewed regarding Key - MSJ Response	Heather Leonard	0.1
10/31/2022	3 emails sent/reviewed regarding Key	Heather Leonard	0.1
10/31/2022	1 email sent/reviewed regarding Key - Opposition to motion to supplement	Heather Leonard	0.1
10/30/2022	4 emails sent/reviewed regarding Key	Heather Leonard	0.1
10/30/2022	2 emails sent/reviewed regarding Key v HMMA/Dynamic update	Heather Leonard	0.1
10/30/2022	1 email sent/reviewed regarding Key facts - v3	Heather Leonard	0.1
10/27/2022	1 email sent/reviewed regarding Citation Check Chart - completed (kEY)	Heather Leonard	0.1
10/26/2022	2 internal messages sent/reviewed	Heather Leonard	0.1
10/25/2022	1 email sent/reviewed regarding Key - Opposition to motion to supplement	Heather Leonard	0.1
10/25/2022	HMMA Response to Interrogatories - 2021.12.09 reviewed	Heather Leonard	0.1
10/25/2022	Response to motion to file supplemental brief due attended	Heather Leonard	0.5
10/25/2022	Cover Sheet - Ex 2 created, then edited	Heather Leonard	0.1
10/25/2022	PL - Response to Motion for Leave to File Supplemental Brief - to file created, then edited	Heather Leonard	0.4
10/25/2022	Working on Key MSJ Responses	Heather Leonard	2
10/25/2022	Cover Sheet - Ex 1 created, then edited	Heather Leonard	0.1
10/25/2022	Ex 2 - HMMA Interrogatory Answers created	Heather Leonard	0.1
10/24/2022	PL - Response to Motion for Leave to File Supplemental Brief edited	Heather Leonard	2.1
10/24/2022	1 email sent/reviewed regarding Key v HMMA - EEOC filings in ND AL	Heather Leonard	0.1
10/24/2022	1 email sent/reviewed regarding Etrans for Key - these are the only transcripts I've got	Heather Leonard	0.1
10/24/2022	Wilson v. Sprint_United Mgmt. Co... 2011 U.S. Dist. LEXIS 73743 edited	Heather Leonard	0.2
10/24/2022	1 email sent/reviewed regarding Key - Opposition to motion to supplement	Heather Leonard	0.1
10/24/2022	Doc. 68-12 - Exhibit 12 - Ptl's Depo Transcript -part 1 reviewed	Heather Leonard	0.1
10/24/2022	2 emails sent/reviewed regarding Key - EEOC screw up does not fall on us	Heather Leonard	0.3
10/24/2022	For MSJ Response brief - objection to Gloria Robinson Declaration edited	Heather Leonard	0.1
10/24/2022	Witkerson v. Grinnell Corp., 270 F.3d 1314 reviewed	Heather Leonard	0.2
10/24/2022	Doc. 68-2 -Exhibit 2 - Depo Transcript of R. Burns reviewed	Heather Leonard	0.1
10/20/2022	1 email sent/reviewed regarding Key v HMMA, HEA and Dynamic	Heather Leonard	0.4
10/20/2022	2 emails sent/reviewed regarding Answers	Heather Leonard	0.1
10/20/2022	1 email sent/reviewed regarding Etrans for Key - these are the only transcripts I've got	Heather Leonard	0.1
10/20/2022	1 email sent/reviewed regarding Key - v HMMA Et al - Dynamic Spires Errata Sheet	Heather Leonard	0.1
10/20/2022	PL - Response to Motion for Leave to File Supplemental Brief edited	Heather Leonard	0.7
10/19/2022	PL - Response to Motion for Leave to File Supplemental Brief edited	Heather Leonard	0.4
10/18/2022	LEXIS research for objection to Robinson SJ declaration	Heather Leonard	0.5
10/18/2022	Doc. 68-13 - Exhibit 12 - Ptl's Depo Transcript Part 2 reviewed	Heather Leonard	0.1
10/18/2022	1 email sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Order to Show Cause	Heather Leonard	0.1
10/18/2022	For MSJ Response brief - objection to Gloria Robinson Declaration created, then edited	Heather Leonard	1.6
10/18/2022	Doc. 68-12 - Ptl's Depo Transcript -part 1 reviewed	Heather Leonard	0.1
10/18/2022	1 email sent/reviewed regarding Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
10/18/2022	1 email sent/reviewed regarding Key MSJ Response - section objecting to Robinson's declaration	Heather Leonard	0.1
10/18/2022	Memo edited - 2022.06.21 - Email from client on 8/1/17 email	Heather Leonard	0.1
10/18/2022	Composite exhibit of deposition scheduling emails reviewed	Heather Leonard	0.1
10/18/2022	Untimely produced declaratoin - Duncan v Davita Healthcare Partners created	Heather Leonard	0.1
10/18/2022	Doc. 57 - ORDER IT IS ORDERED that the 56]motion to amend is GRANTED reviewed	Heather Leonard	0.1
10/18/2022	PL - Response to Motion for Leave to File Supplemental Brief created, then edited	Heather Leonard	0.4
10/18/2022	Doc. 68-5 - Exhibit 5 - Declaration of G. Robinson reviewed	Heather Leonard	0.1
10/17/2022	1 email sent/reviewed regarding Fact Check Assignment on Trello	Heather Leonard	0.1

10/13/2022	1 email sent/reviewed regarding Hyundai ENG America, Inc., Key - Letter to Judge Marks enc. Courtesy Copy Binder of HEA's MSJ, Brief and Evidentiary Submission	Heather Leonard	0.1
10/13/2022	Read Dynamic's MSJ Brief (Doc. 74)	Heather Leonard	0.5
10/13/2022	Review Docs. 76-77 - Briefing orders on dispositive motions and supplemental briefing	Heather Leonard	0.1
10/13/2022	2 emails sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Order to Show Cause	Heather Leonard	0.2
10/13/2022	2 emails sent/reviewed regarding HMMA's Motion for Summary Judgment	Heather Leonard	0.2
10/13/2022	1 email sent/reviewed regarding HEA and Dynamic Brief's fact sections for you to type in your response	Heather Leonard	0.1
10/12/2022	2 emails sent/reviewed regarding Key v. HMMA et al - HEA SJ Filings	Heather Leonard	0.1
10/12/2022	2 emails sent/reviewed regarding Key v. HMMA	Heather Leonard	0.1
10/11/2022	1 email sent/reviewed regarding Case	Heather Leonard	0.1
10/11/2022	1 email sent/reviewed regarding Signed Errata Sheet, Cassandra Williams, Job #36228	Heather Leonard	0.1
10/11/2022	4 emails sent/reviewed regarding Key v Dynamic - Spiers deposition to summarize	Heather Leonard	0.1
10/11/2022	1 email sent/reviewed regarding Key v. HMMA	Heather Leonard	0.1
10/4/2022	1 email sent/reviewed regarding Key v HMMA - Riddle deposition to summarize	Heather Leonard	0.1
10/4/2022	1 email sent/reviewed regarding Key v Dynamic - Spiers deposition to summarize	Heather Leonard	0.1
10/4/2022	1 email sent/reviewed regarding key v dynamic - unemployment hearing to summarize	Heather Leonard	0.1
10/3/2022	4 messages sent/reviewed	Heather Leonard	0.1
10/1/2022	3 emails sent/reviewed regarding Key depo- Carolyn Williams	Heather Leonard	0.1
10/1/2022	1 email sent/reviewed regarding Deposition Scheduling for October 17 and 18	Heather Leonard	0.1
9/25/2022	1 email sent/reviewed regarding Case	Heather Leonard	0.1
9/23/2022	1 email sent/reviewed regarding Payment Received	Heather Leonard	0.1
9/23/2022	1 email sent/reviewed regarding Job 36228 Electronic Deposition Transcript of Cassandra Williams taken on Tuesday, September 6, 2022	Heather Leonard	0.1
9/23/2022	1 message sent/reviewed	Heather Leonard	0.1
9/15/2022	1 email sent/reviewed regarding Order Confirmation	Heather Leonard	0.1
9/15/2022	Court - Notice Concerning Settlement and Mediation edited and reviewed	Heather Leonard	0.1
9/15/2022	1 email sent/reviewed regarding Key v. HMMA, HEA, Dynamic 2:19-cv-767-ECM	Heather Leonard	0.1
9/15/2022	1 email sent/reviewed regarding JOB11899 Transcript Files Ray Cureton	Heather Leonard	0.1
9/15/2022	1 email sent/reviewed regarding Key v HMMA, HEA, and Dynamic - Notice Concerning Settlement and Mediation	Heather Leonard	0.1
9/13/2022	1 email sent/reviewed regarding Invoice 20035 from Cte, LLC -- In the Matter of:Key v. Hyundai Motor Manfacturing Alabama LLC., et al.	Heather Leonard	0.4
9/13/2022	Email attachment reviewed - Invoice-20035	Heather Leonard	0.1
9/13/2022	1 email sent/reviewed regarding Mailroom position	Heather Leonard	0.1
9/12/2022	1 email sent/reviewed regarding Key - unemployment hearing	Heather Leonard	0.1
9/8/2022	30(b)(6) Deposition Notice - HEA edited	Heather Leonard	0.4
9/7/2022	1 email sent/reviewed regarding Key v HMMA, HEA, and Dynamic - Notice Concerning Settlement and Mediation	Heather Leonard	0.1
9/7/2022	Ex 41 reviewed	Heather Leonard	0.3
9/7/2022	Court - Notice Concerning Settlement and Mediation created, then edited	Heather Leonard	0.1
9/6/2022	Ex 55 HMMA Pay Raises reviewed	Heather Leonard	0.1
9/6/2022	Ex 5 - Contractor Handbook 135-235 reviewed	Heather Leonard	0.1
9/6/2022	Ex 41 reviewed	Heather Leonard	0.3
9/6/2022	Ex 11 - HEA Pstn Sment HEA 53-56 reviewed	Heather Leonard	0.1
9/6/2022	Ex 20 Mailroom Job Duties reviewed	Heather Leonard	0.1
9/6/2022	HEA0163 - HEA0236 reviewed	Heather Leonard	0.1
9/6/2022	Dynamic - Key - 003224-003283 - Confidential reviewed	Heather Leonard	0.1
9/6/2022	Ex 9 - Appearance Standards for Security Personnel HEA 1-3 reviewed	Heather Leonard	0.1
9/6/2022	Ex 40 reviewed	Heather Leonard	0.1
9/6/2022	HEA0241 reviewed	Heather Leonard	0.1
9/6/2022	Dynamic - Key - 000140-000145 reviewed	Heather Leonard	0.1
9/6/2022	HEA 30(b)(6)/Cassandra Williams Deposition	Heather Leonard	3.5
9/6/2022	Ex 36 reviewed	Heather Leonard	0.1
9/6/2022	Ex 47 - Mailroom Pay Issues reviewed	Heather Leonard	0.1
9/5/2022	HEA0252 created	Heather Leonard	0.1
9/5/2022	Outline - HEA created, then edited	Heather Leonard	0.5
9/5/2022	Email attachment reviewed - HEA0280	Heather Leonard	0.1
9/5/2022	Email attachment reviewed - HEA0252	Heather Leonard	0.1
9/5/2022	1 email sent/reviewed regarding Key v. Dynamic et al - Dynamic production 635-3283 [W0V-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
9/5/2022	1 email sent/reviewed regarding Deposition on Tuesday	Heather Leonard	0.1
9/5/2022	2 emails sent/reviewed regarding settlement conference: Key v HMMA	Heather Leonard	0.1
9/2/2022	2 emails sent/reviewed regarding RESPONSE NEEDED!! Confirmation for Tuesday, September 6, 2022 Re: Davita M. Key v. Hyundai Motor Manufacturing Alabama, LLC; Hyundai Engineering America, Inc.; and Dynamic Security.	Heather Leonard	0.1
8/29/2022	1 email sent/reviewed regarding Please print	Heather Leonard	0.1
8/29/2022	Esquire 2022.08.29 Re paying bill for plaintiff depo created, then edited and reviewed	Heather Leonard	0.1

8/29/2022	1 email sent/reviewed regarding Please Confirm -- Job11899 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/29/2022	1 email sent/reviewed regarding Please Confirm -- Job11899 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/25/2022	Def 2022.08.25 - HMMA Response to Rule 37 Letter created	Heather Leonard	0.1
8/25/2022	1 email sent/reviewed regarding D. Key v. HMMA, et al.	Heather Leonard	0.1
8/25/2022	1 email sent/reviewed regarding Key v. HMMA, HEA, and Dynamic - Defendant Dynamic's Third Amended Initial Disclosures [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
8/24/2022	1 email sent/reviewed regarding Please Confirm -- Job11853 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/24/2022	7 emails sent/reviewed regarding D. Key v. HMMA, et al. Currenton depo time - 9:00 am [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.3
8/24/2022	1 email sent/reviewed regarding Please Confirm -- Job11853 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/24/2022	1 email sent/reviewed regarding Please Confirm -- Job11853 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/24/2022	1 email sent/reviewed regarding Please Confirm -- Job11853 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/24/2022	1 email sent/reviewed regarding Please Confirm -- Job11853 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/24/2022	1 email sent/reviewed regarding Please Confirm -- Job11853 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/24/2022	1 email sent/reviewed regarding Please Confirm -- Job11853 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/24/2022	1 email sent/reviewed regarding Activity in Case 2:22-cv-00505-MHH Key v. Hyundai Motor Manufacturing Alabama LLC et al Transcript Deposition Re-notice - Fourth - Ray Cureton created, then edited	Heather Leonard	0.1
8/23/2022	1 email sent/reviewed regarding Deposition	Heather Leonard	0.1
8/23/2022	1 email sent/reviewed regarding D. Key v. HMMA, et al. Currenton depo time - 9:00 am [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
8/23/2022	1 email sent/reviewed regarding D. Key v. HMMA, et al. Currenton depo time - 9:00 am	Heather Leonard	0.1
8/23/2022	Deposition Re-notice - Third - Ray Cureton created, then edited	Heather Leonard	0.2
8/23/2022	3 emails sent/reviewed regarding D. Key v. HMMA, et al. Currenton depo time [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
8/23/2022	1 email sent/reviewed regarding Please Confirm -- Job11853 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/23/2022	1 email sent/reviewed regarding Please Confirm -- Job11853 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/23/2022	1 email sent/reviewed regarding Please Confirm -- Job11853 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/22/2022	1 email sent/reviewed regarding Key v HMMA, HEA, Dynamic - deposition notice for HEA 30(b)(6)/Williams	Heather Leonard	0.1
8/22/2022	1 email sent/reviewed regarding Please Confirm -- Job11853 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/22/2022	1 email sent/reviewed regarding You are Scheduled AND WE ARE SO EXCITED!! Tuesday, September 6, 2022 Re: Davita M. Key v. Hyundai Motor Manufacturing Alabama, LLC; Hyundai Engineering America, Inc.; and Dynamic Si	Heather Leonard	0.1
8/22/2022	Hearing on EEOC Motion to Quash (Phone) attended	Heather Leonard	0.5
8/22/2022	1 email sent/reviewed regarding Please Confirm -- Job11756 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/22/2022	2 emails sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Order	Heather Leonard	0.1
8/22/2022	1 email sent/reviewed regarding Please Confirm -- Job11853 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/22/2022	1 email sent/reviewed regarding Your letter of August 10, 2022	Heather Leonard	0.1
8/22/2022	1 email sent/reviewed regarding Job Cancellation -- Job11756 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/22/2022	1 email sent/reviewed regarding Job Cancellation -- Job11756 Video Deposition of Ray Cureton	Heather Leonard	0.1
8/22/2022	Deposition Re-notice - Second - Ray Cureton created, then edited	Heather Leonard	0.2
8/22/2022	2 emails sent/reviewed regarding Court Reporter Request - Deposition on 9/6 at 9:30 at Bradley's Montgomery Office	Heather Leonard	0.1
8/22/2022	Subpoena to Testify in a Civil Action - Ray Cureton edited	Heather Leonard	0.1
8/22/2022	1 email sent/reviewed regarding Key v HMMA, HEA, and Dynamic - Cureton renotice and subpoena	Heather Leonard	0.1
8/22/2022	Deposition Notice - Williams, Cassandra edited	Heather Leonard	0.1
8/22/2022	2 emails sent/reviewed regarding Activity in Case 2:22-cv-00505-MHH Key v. Hyundai Motor Manufacturing Alabama LLC et al Order	Heather Leonard	0.1
8/22/2022	Review Doc. 64 - Order on motion to take deposition out of item	Heather Leonard	0.1
8/22/2022	30(b)(6) Deposition Re - Notice - HEA created, then edited	Heather Leonard	0.3
8/22/2022	1 email sent/reviewed regarding D. Key v. HMMA	Heather Leonard	0.1
8/19/2022	1 email sent/reviewed regarding Key v HMMA, HEA, and Dynamic - deposition scheduling call summary	Heather Leonard	0.1
8/19/2022	1 email sent/reviewed regarding Dynamic - Key - Dynamic Security, Inc.'s Amended Objections to Re-Notice Rule 30(b)(6) Deposition of Dynamic Security, Inc. [EM 08-18-2022].nrl	Heather Leonard	0.1
8/19/2022	1 email sent/reviewed regarding Key v HMMA, HEA, and Dynamic - motion to take Williams/HEA 30(b)(6) on Sept 6	Heather Leonard	0.1
8/19/2022	1 email sent/reviewed regarding Dynamic	Heather Leonard	0.1
8/19/2022	Dopo Notes - Dynamic - Crystal Riddle/30(b)(6) created, then edited and reviewed	Heather Leonard	1.3
8/19/2022	Dynamic - Key - Dynamic Security, Inc.'s Amended Objections to Re-Notice Rule 30(b)(6) Deposition of Dynamic Security, Inc. [EM 08-18-2022] created	Heather Leonard	0.1
8/19/2022	1 email sent/reviewed regarding Dynamic 30(b)(6) Deposition Exhibits [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
8/19/2022	1 email sent/reviewed regarding Dynamic - Key - Dynamic Security, Inc.'s Amended Objections to Re-Notice Rule 30(b)(6) Deposition of Dynamic Security, Inc. [EM 08-18-2022].PDF	Heather Leonard	0.1
8/19/2022	2 emails sent/reviewed regarding Scheduling Request: Heather Leonard, PC	Heather Leonard	0.1
8/19/2022	2 emails sent/reviewed regarding Key v. HMMA, HEA, and Dynamic - 30(b)(6) Notice to Dynamic [IWOV-WSACTIVELLP.FID1997338]	Heather Leonard	0.1
8/19/2022	HEA0237 created	Heather Leonard	0.1
8/19/2022	Deposition of Kristal Riddle	Heather Leonard	5
8/19/2022	Deposition of Sherry Spires	Heather Leonard	1.8
8/19/2022	2 emails sent/reviewed regarding HEA - PRODUCTION	Heather Leonard	0.2
8/19/2022	1 email sent/reviewed regarding Andrew Robinson has shared the folder 'Dynamic Key Production to Plaintiff on 08182022' with you.	Heather Leonard	0.1
8/19/2022	1 email sent/reviewed regarding Key v HMMA - EEOC filings in ND AL	Heather Leonard	0.1
8/19/2022	Motion to Take Deposition Out of Time - Draft created, then edited	Heather Leonard	0.5
8/19/2022	1 email sent/reviewed regarding Dynamic 30(b)(6) Deposition Exhibits	Heather Leonard	0.1
8/19/2022	Dopo Notes - Dynamic - Crystal Riddle/30(b)(6) created, then edited	Heather Leonard	0.3

7/16/2022	1 email sent/reviewed regarding invoice 19891 from Citec, LLC -- In the Matter of:Key v. Hyundai Motor Manufacturing Alabama LLC, et al.	Heather Leonard	0.1
6/27/2022	1 email sent/reviewed regarding Pictures	Heather Leonard	0.1
6/27/2022	1 email sent/reviewed regarding Case	Heather Leonard	0.1
6/24/2022	1 email sent/reviewed regarding Hair Pictures	Heather Leonard	0.1
6/23/2022	1 email Post Mortem Sheet reviewed	Heather Leonard	0.2
6/23/2022	1 email sent/reviewed regarding Case	Heather Leonard	0.1
6/22/2022	HEA0153 - HEA0256 reviewed	Heather Leonard	0.2
6/22/2022	HEC-2485 reviewed	Heather Leonard	0.1
6/21/2022	Memo created - 2022-06-21 - Email from client ton BA/JL/JZ email	Heather Leonard	0.1
6/21/2022	1 email sent/reviewed regarding Deposition	Heather Leonard	0.1
6/21/2022	2 emails sent/reviewed regarding Case	Heather Leonard	0.1
6/20/2022	1 email sent/reviewed regarding Key v. HIMA, et al - updated 30(b)(6) Depo Notice - HIMA	Heather Leonard	0.1
6/20/2022	1 email sent/reviewed regarding Key v. HIMA, et al - updated 30(b)(6) Depo Notice - HIMA	Heather Leonard	0.1
6/20/2022	Notes - Deposition of D Key - 2022-06-20 created, then edited	Heather Leonard	0.7
6/20/2022	Dépo Post Mortem Sheet edited	Heather Leonard	0.2
6/20/2022	Notes - Deposition of D Key - 2022-06-20 edited	Heather Leonard	0.4
6/19/2022	E1 - 30(b)(6) Deposition Notice created	Heather Leonard	0.2
6/19/2022	Notes - Deposition of D Key - 2022-06-20 created, then edited	Heather Leonard	0.1
6/19/2022	2 emails sent/reviewed regarding Deposition	Heather Leonard	0.1
6/19/2022	Notes - Deposition of D Key - 2022-06-20 created, then edited	Heather Leonard	0.1
6/19/2022	Dépo Post Mortem Sheet created	Heather Leonard	0.1
6/13/2022	2 emails sent/reviewed regarding Key's deposition on Monday, June 20.	Heather Leonard	0.1
6/16/2022	1 email sent/reviewed regarding Key's deposition on Monday, June 20.	Heather Leonard	0.1
6/15/2022	1 email sent/reviewed regarding June 20th, 9:30 am deposition of Davis Key	Heather Leonard	0.1
6/15/2022	1 email sent/reviewed regarding June 20th, 9:30 am deposition of Davis Key	Heather Leonard	0.1
6/13/2022	1 email sent/reviewed regarding Key v. HIMA, et al - updated 30(b)(6) Depo Notice - HIMA	Heather Leonard	0.1
6/16/2022	1 email sent/reviewed regarding D. Key v. HIMA, et al.	Heather Leonard	0.1
6/8/2022	1 email sent/reviewed regarding Conference Room Scheduling	Heather Leonard	0.1
6/8/2022	1 email sent/reviewed regarding Recurring and Transcript of unemployment compensation hearing	Heather Leonard	0.1
6/8/2022	1 email sent/reviewed regarding Pay Information	Heather Leonard	0.1
6/8/2022	1 email sent/reviewed regarding Preparation Meeting with client and Leslie	Heather Leonard	0.1
6/8/2022	1 email sent/reviewed regarding Key	Heather Leonard	0.1
6/3/2022	8 emails sent/reviewed regarding Key	Heather Leonard	0.1
6/2/2022	3 emails sent/reviewed regarding Key	Heather Leonard	0.1
6/1/2022	1 email sent/reviewed regarding Key v. HIMA, HEA and Dynamic	Heather Leonard	0.1
5/24/2022	1 email sent/reviewed regarding Key status - for our files	Heather Leonard	0.1
5/24/2022	1 email sent/reviewed regarding Key v. Dynamic et al Discovery letter and documents	Heather Leonard	0.1
5/24/2022	1 email sent/reviewed regarding [NELA(A)] Reinstating Previously Dismissed Claim	Heather Leonard	0.1
5/24/2022	1 email sent/reviewed regarding Dynamic Security Objections to 30(b)(6) Notice [HNOV-HSACTIVEWLLP.FD1748867]	Heather Leonard	0.1
5/16/2022	1 email sent/reviewed regarding Key v. HIMA, HEA and Dynamic - follow up on deposition scheduling	Heather Leonard	0.1
5/16/2022	1 internal message sent/reviewed	Heather Leonard	0.1
5/16/2022	1 email sent/reviewed regarding D. Key v. HIMA, et al.	Heather Leonard	0.1
5/16/2022	1 email sent/reviewed regarding Key v. HIMA, HEA and Dynamic - your deposition is set June 20, 2022 at 9:30 in Montgomery	Heather Leonard	0.1
5/16/2022	Email attachment reviewed - image_12398672	Heather Leonard	0.1
5/16/2022	5 emails sent/reviewed regarding Case	Heather Leonard	0.1
5/16/2022	2 messages sent/reviewed	Heather Leonard	0.1
5/16/2022	2 emails sent/reviewed regarding Dovita Key v Hyundai/Dynamic Deposition Preparation Meeting	Heather Leonard	0.1
5/16/2022	1 email sent/reviewed regarding Dovita Key v Hyundai/Dynamic Deposition Preparation Meeting	Heather Leonard	0.1
5/16/2022	1 email sent/reviewed regarding Data Bunting has shared the folder Dynamic - Key Production to Plaintiff 05112022 with you.	Heather Leonard	0.1
5/16/2022	Client - Dpo Scheduling and Prep Letter.docx created, then edited	Heather Leonard	0.1
5/16/2022	1 email sent/reviewed regarding Data Bunting has shared the folder Dynamic - Key Production to Plaintiff 05112022 with you.	Heather Leonard	0.1
5/12/2022	6 emails sent/reviewed regarding Key v. HIMA, HEA and Dynamic - follow up on deposition scheduling	Heather Leonard	0.5
5/10/2022	7 emails sent/reviewed regarding Case	Heather Leonard	0.2
5/10/2022	1 email sent/reviewed regarding Case	Heather Leonard	0.1
4/25/2022	1 email sent/reviewed regarding Key v. HIMA, HEA, and Dynamic - 30(b)(6) Notice to Dynamic	Heather Leonard	0.1
4/25/2022	1 email sent/reviewed regarding EEOC Motion and Memorandum in Support of its Motion to Quash Subpoenas	Heather Leonard	0.1
4/25/2022	7 emails sent/reviewed regarding 22-mc-565, Key v. Hyundai Motor Mfg. Am., LLC	Heather Leonard	0.1
4/25/2022	1 email sent/reviewed regarding See if any of this helps in Key	Heather Leonard	0.1

4/25/2022	1 email sent/reviewed regarding Activity in Case 2:22-md-00505-MHH Key v. Hyundai Motor Manufacturing Alabama LLC et al Motion to Quash	Heather Leonard	0.1
4/25/2022	1 email sent/reviewed regarding Email: Wilkerson v. Grinnell Corp., 270 F.3d 1314	Heather Leonard	0.1
4/25/2022	Memo created, then reviewed - Court Order Denying Motion to Quash on EEOC	Heather Leonard	0.1
4/25/2022	1 email sent/reviewed regarding Davita Key v. HMMA, et al.	Heather Leonard	0.1
4/25/2022	1 email sent/reviewed regarding Key v. HMMA, HEA, and Dynamic - 30(b)(6) Notice to Dynamic [IWOV-WSACTIVEVLLP.FID1997338]	Heather Leonard	0.1
4/15/2022	Doc. 59-1 - Ex. A. EEOC Deposition Subpoena - MOTION to Quash Subpoena by Equal Employment Opportunity Commission reviewed	Heather Leonard	0.1
4/15/2022	1 email sent/reviewed regarding HMMA 30b6	Heather Leonard	0.1
4/15/2022	1 email sent/reviewed regarding Key v. Dynamic et al - Dynamic 30(b) notice	Heather Leonard	0.1
4/15/2022	Doc. 59 - EEOC Motion and Memorandum in Support of MOTION to Quash Subpoena by Equal Employment Opportunity Commission reviewed	Heather Leonard	0.1
4/15/2022	1 email sent/reviewed regarding Davita Key v. HMMA, et al	Heather Leonard	0.1
4/13/2022	1 email sent/reviewed regarding Dynamic Security is suing Chris Hargrove	Heather Leonard	0.1
4/13/2022	1 email sent/reviewed regarding Key v. HMMA, HEA, Dynamic - PL Discovery Response to Dynamic	Heather Leonard	0.1
4/13/2022	1 email sent/reviewed regarding fyi -	Heather Leonard	0.1
4/6/2022	1 email sent/reviewed regarding Employment	Heather Leonard	0.1
4/5/2022	2 emails sent/reviewed regarding Key's 30 b 6 notice issued to HMMA	Heather Leonard	0.1
4/5/2022	1 email sent/reviewed regarding Employment	Heather Leonard	0.1
4/4/2022	Review Doc. 57 - Updated Scheduling Order	Heather Leonard	0.1
4/4/2022	4 emails sent/reviewed regarding Message For (7865749161:9699321) 2022-04-04 12:29PM	Heather Leonard	0.2
4/4/2022	Dynamic - Key - Email dated 03-20-2019 w- Right to Sue attached - 000043-000048 reviewed	Heather Leonard	0.1
4/4/2022	30(b)(6) Deposition Notice - Dynamic created, then edited	Heather Leonard	0.8
4/4/2022	1 email sent/reviewed regarding Message For (7865749161:9698765) 2022-04-04 11:10AM	Heather Leonard	0.1
4/4/2022	Dynamic - Key - Production - 000049-000092 created	Heather Leonard	0.1
4/4/2022	Dynamic - Key - Initial Disclosures - 000001 - 000038 reviewed	Heather Leonard	0.1
4/4/2022	Memo created - Phone imaging Notes on calls to vendors to image Plaintiff's phone	Heather Leonard	0.1
4/4/2022	1 email sent/reviewed regarding Draft notice to Dynamic for your review and revision	Heather Leonard	0.1
4/4/2022	1 email sent/reviewed regarding Key v HMMA, HEA and Email to defendants with proposed deposition schedule for depositions needed by the Plaintiff.	Heather Leonard	0.2
4/4/2022	Dynamic - Key - 000146-000147 reviewed	Heather Leonard	0.1
4/4/2022	1 email sent/reviewed regarding Key v HMMA, HEA, and Dynamic - 30(b)(6) Notice to HEA	Heather Leonard	0.1
4/4/2022	1 email sent/reviewed regarding Key v HMMA, HEA, and Dynamic - 30(b)(6) Deposition Notice to HMMA	Heather Leonard	0.2
4/4/2022	Matter admin	Heather Leonard	0.1
4/4/2022	Dynamic - Key - 000093-000111 reviewed	Heather Leonard	0.1
3/31/2022	1 email sent/reviewed regarding Key v HMMA, HEA and Dynamic - Plaintiff's motion to amend the scheduling order and request for time to discuss discovery issues/depositions	Heather Leonard	0.1
3/31/2022	1 email sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Order	Heather Leonard	0.1
3/30/2022	4 emails sent/reviewed regarding Key v HMMA, HEA and Dynamic - Plaintiff's motion to amend the scheduling order and request for time to discuss discovery issues/depositions	Heather Leonard	0.2
3/28/2022	Witness 2022.03.28 - Letter re Initial Contact - Nicole Scavella created, then edited	Heather Leonard	0.1
3/28/2022	1 email sent/reviewed regarding Dynamic Security, Inc. / Davita Key	Heather Leonard	0.1
3/28/2022	Matter admin	Heather Leonard	0.1
3/28/2022	1 email sent/reviewed regarding Stacy Waldo has shared the folder 'Dynamic Security, Inc. - Davita M. Keys Second Production to Plaintiff produced 03-25-2022' with you.	Heather Leonard	0.1
3/28/2022	Witness 2022.03.28 - Letter re Initial Contact - Gloria Robinson created, then edited	Heather Leonard	0.1
3/28/2022	Witness 2022.03.28 - Letter re Initial Contact - Maurice Chambliss created, then edited	Heather Leonard	0.1
3/28/2022	1 email sent/reviewed regarding Davita Key - Employment Earnings update	Heather Leonard	0.1
3/28/2022	PL - Motion to Amend Scheduling Order - Final to File created, then edited	Heather Leonard	0.2
3/28/2022	Witness 2022.03.28 - Letter re Initial Contact - Latunya Howell created, then edited	Heather Leonard	0.1
3/28/2022	6 emails sent/reviewed regarding Key v HMMA, HEA and Dynamic - Plaintiff's motion to amend the scheduling order and request for time to discuss discovery issues/depositions	Heather Leonard	0.2
3/28/2022	Witness 2022.03.28 - Letter re Initial Contact - Ray Cureton created, then edited	Heather Leonard	0.1
3/25/2022	1 email sent/reviewed regarding Key v HMMA, HEA and Email to defendants re: proposed motion, deposition scheduling, and issue with Plaintiff's phone/ESI	Heather Leonard	0.2
3/25/2022	Drafted Motion to Amend Scheduling Order	Heather Leonard	0.9
3/23/2022	1 email sent/reviewed regarding Key v HMMA - subpoena notice	Heather Leonard	0.1
3/23/2022	subpoena for deposition of A. Martin-Shutz created	Heather Leonard	0.1
3/21/2022	1 email sent/reviewed regarding Key v. HEA et al 2:10-cv-0767	Heather Leonard	0.1
3/21/2022	1 email sent/reviewed regarding Key v. HEA et al 2:10-cv-0767 - Dynamic Security Discovery Requests	Heather Leonard	0.1
3/21/2022	PL - Draft Responses - HL Review created, then reviewed	Heather Leonard	0.2
3/21/2022	1 email sent/reviewed regarding Key v. HEA et al 2:10-cv-0767 - Plaintiff Discovery Responses	Heather Leonard	0.1
3/14/2022	1 email sent/reviewed regarding Dynamic Security, Inc. / Davita Key	Heather Leonard	0.1
3/14/2022	1 email sent/reviewed regarding Key v. HMMA et al - updated production	Heather Leonard	0.1
3/10/2022	1 email sent/reviewed regarding Davita Key v. Hyundai Motor Manufacturing Alabama, LLC, et al. - Depo Notice to Plaintiff	Heather Leonard	0.1
3/10/2022	1 email sent/reviewed regarding [NELA-AL] : Objection Re: subpoena documents on the basis of joint defense agreement**	Heather Leonard	0.1
3/10/2022	2 emails sent/reviewed regarding Key's tax returns and earnings records from 2017 to the present	Heather Leonard	0.1
3/8/2022	1 email sent/reviewed regarding Key's tax returns and earnings records from 2017 to the present	Heather Leonard	0.1

3/9/2022	2 emails sent/reviewed regarding Key v. HMMIA, HEA, Dynamic 2:19-cv-0767 - Rule 37 Letter	Heather Leonard	0.1
3/17/2022	1 email sent/reviewed regarding Haven't forgotten about you	Heather Leonard	0.1
2/25/2022	5 emails sent/reviewed regarding Key	Heather Leonard	0.2
2/24/2022	2 emails sent/reviewed regarding Message For (78657-49161-9543144) 2022-02-24 04:02PM	Heather Leonard	0.3
2/23/2022	1 email sent/reviewed regarding Case	Heather Leonard	0.1
2/22/2022	1 email sent/reviewed regarding Haven't forgotten about you	Heather Leonard	0.1
2/21/2022	3 emails sent/reviewed regarding Haven't forgotten about you	Heather Leonard	0.1
2/19/2022	3 emails sent/reviewed regarding Haven't forgotten about you	Heather Leonard	0.1
2/18/2022	Datta Key v HMMIA, HEA and Dynamic - HEA's First Discovery Requests to Plaintiff 487-1-4300-8527 v.1 created	Heather Leonard	0.1
2/17/2022	Type in Defendant's Discovery Requests for	Heather Leonard	0.7
2/17/2022	2 emails sent/reviewed regarding Responses	Heather Leonard	0.1
2/17/2022	4 emails sent/reviewed regarding Haven't forgotten about you	Heather Leonard	0.1
2/17/2022	3 emails sent/reviewed regarding Key v HMMIA, deposition of Plaintiff	Heather Leonard	0.1
2/16/2022	3 emails sent/reviewed regarding Employment	Heather Leonard	0.1
2/15/2022	1 email sent/reviewed regarding D. Key v. HMMIA, et al.	Heather Leonard	0.1
2/17/2022	2 emails sent/reviewed regarding Datta Key v. HMMIA, et al.	Heather Leonard	0.1
2/14/2022	Review HEA's discovery responses	Heather Leonard	0.2
2/14/2022	Matter admin	Heather Leonard	0.1
2/14/2022	1 email sent/reviewed regarding Key's proposed damages charts	Heather Leonard	0.1
1/30/2022	1 email sent/reviewed regarding PI's Supplemental Discovery Responses and Amended Disclosures	Heather Leonard	0.1
1/30/2022	1 email sent/reviewed regarding Heather's Backlog Chart	Heather Leonard	0.1
1/29/2022	1 email sent/reviewed regarding D. Key v. HMMIA, et al.	Heather Leonard	0.1
1/27/2022	Review S000001 - S000382 - Certified Unemployment Records on D. Key from State of Alabama (produced by HMMIA)	Heather Leonard	0.1
1/26/2022	2 emails sent/reviewed regarding Dynamic's Discovery Response [IWOV-W5ACTNELL.P.FID1997338]	Heather Leonard	0.1
1/26/2022	1 email sent/reviewed regarding Key v. HMMIA, HEA, Dynamic Case No. 2:19-cv-767-ECM	Heather Leonard	0.1
1/25/2022 COMM	1 email sent/reviewed regarding Communicate - Call will. Plaintiff: Dynamic's discovery responses	Heather Leonard	0.1
1/26/2022	1 email sent/reviewed regarding Plaintiff Supplemental Discovery Response to HMMIA	Heather Leonard	0.1
1/19/2022	1 email sent/reviewed regarding Key v HMMIA, et al - Dynamic's discovery responses	Heather Leonard	0.1
1/18/2022	1 email sent/reviewed regarding Dynamic's discovery responses [IWOV-W5ACTNELL.P.FID1997338]	Heather Leonard	0.1
1/18/2022	Discovery call set and requested by Defendant HMMIA, cast with Brown, Middlebrooks, Leonard, and Palmer	Heather Leonard	0.1
1/14/2022	2 emails sent/reviewed regarding Key - HMMIA, supplemental responses	Heather Leonard	0.1
1/14/2022	1 email sent/reviewed regarding Supplemental Interrogatory Response	Heather Leonard	0.1
1/14/2022	Def. Dynamic Response to HFA, RFO, and Interrogatories reviewed	Heather Leonard	0.1
1/13/2022	Def. 2022.01.12 - Rule 37 letter - Ford Harrison, LLP edited and reviewed	Heather Leonard	0.1
1/13/2022	1 email sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD/Key v. Hyundai Motor Manufacturing Alabama, LLC et al Add and Terminate Attorneys	Heather Leonard	0.1
1/13/2022	Pl. - First RFA, interrogatories, and RFO to Dynamic - Served 2021.12.09 reviewed	Heather Leonard	0.1
1/13/2022	1 email sent/reviewed regarding Key v HMMIA; Plaintiff's discovery responses	Heather Leonard	0.1
1/12/2022	Def 2022.01.12 - Rule 37 letter - Ford Harrison, LLP created, then edited	Heather Leonard	0.1
1/12/2022	Def. Dynamic Response to HFA, RFO, and Interrogatories reviewed	Heather Leonard	0.1
1/12/2022	3 emails sent/reviewed regarding Key v. Hyundai et al. - Dynamic Security's Objections to Plaintiffs First Requests for Admission, Requests for Production, and Interrogatories [IWOV-W5ACTNELL.P.FID1997338]	Heather Leonard	0.1
1/12/2022	1 email sent/reviewed regarding Rule 37 letter to Dynamic in Key - what we've done so far	Heather Leonard	0.1
1/11/2022	1 email sent/reviewed regarding Key v. HMMIA, Dynamic Security and HEA	Heather Leonard	0.1
1/11/2022	1 email sent/reviewed regarding Key v HMMIA; Plaintiff's discovery responses	Heather Leonard	0.1
1/11/2022	1 email sent/reviewed regarding Key v HMMIA, HEA, Dynamic - Plaintiff's discovery requests to Dynamic	Heather Leonard	0.1
1/10/2022	Memo created, then edited - 2022.01.10 - Tom Serrano call re: subpoena	Heather Leonard	0.1
1/10/2022	Matter admin	Heather Leonard	0.2
1/10/2022	1 email sent/reviewed regarding Addresses needed	Heather Leonard	0.1
1/10/2022	1 email sent/reviewed regarding Key Time	Heather Leonard	0.1
1/10/2022	2 emails sent/reviewed regarding Key v. HMMIA, Dynamic Security and HEA	Heather Leonard	0.1
1/10/2022	2 emails sent/reviewed regarding Key v HMMIA, HEA, Dynamic - Plaintiff's discovery requests to Dynamic [IWOV-W5ACTNELL.P.FID1997338]	Heather Leonard	0.1
1/10/2022	Pl. - First RFA, interrogatories, and RFO to Dynamic - Served 2021.12.09 reviewed	Heather Leonard	0.1
1/14/2022	1 email sent/reviewed regarding Key v HMMIA; Plaintiff's discovery responses	Heather Leonard	0.1
1/23/2021	2 emails sent/reviewed regarding Key v HMMIA; Plaintiff's discovery responses	Heather Leonard	0.1
1/20/2021	1 email sent/reviewed regarding Datta Key v. HMMIA, et al.	Heather Leonard	0.1
1/21/2021	1 email sent/reviewed regarding HMMIA's Supplemental document production in response to RFP #1	Heather Leonard	0.1
1/21/2021	1 email sent/reviewed regarding Key	Heather Leonard	0.1
1/21/2021	Review HMMIA's proposed subpoena to the AL DOJ	Heather Leonard	0.1
1/21/2021	1 email sent/reviewed regarding Key v. Hyundai et al - Production of Documents	Heather Leonard	0.1

12/13/2021	1 email sent/reviewed regarding Key v HMMA: Plaintiff's discovery responses	Heather Leonard
12/10/2021	1 emails sent/reviewed regarding Davita Key v. HMMA, - objection to HMMA's designation of documents as confidential	Heather Leonard
12/9/2021	Davita Key Pleading Comparison reviewed	Heather Leonard
12/8/2021	Pl - First RFA, interrogatories, and RPD to Dynamic - Se Final Discovery requests to Dynamic to make esic's suggested changes as well as some changes due to HMMA's discovery responses*	Heather Leonard
12/7/2021	2 emails sent/reviewed regarding Key v HMMA - Production	Heather Leonard
12/6/2021	2 emails sent/reviewed regarding Key v. Hyundai et al. - Discovery Response Draft	Heather Leonard
12/5/2021	1 email sent/reviewed regarding Key v. Hyundai et al. 2:19-CV-767-ECM, Pl. Disc. resp to HMMA	Heather Leonard
12/3/2021	1 email sent/reviewed regarding information	Heather Leonard
12/1/2021	Form, No Footer reviewed	Heather Leonard
12/1/2021	2 emails sent/reviewed regarding Davita Key v. HMMA, et al. - request for an extension to respond to discovery to Monday, December 6	Heather Leonard
12/1/2021	Dynamic - Key - Initial Disclosures [EM 10-12-2021] reviewed	Heather Leonard
12/1/2021	Dynamic - Key - Initial Disclosures - 000001 - 000008 reviewed	Heather Leonard
12/1/2021	Davita Key Pleading Comparison reviewed	Heather Leonard
12/1/2021	Matter admin	Heather Leonard
12/1/2021	PL - First RFA, interrogatories, and RPD to Dynamic - Draft created, then edited and reviewed	Heather Leonard
12/1/2021	Review and calendar dates from Uniform Scheduling Order [Doc. 51]	Heather Leonard
11/20/2021	Notes for Scheduling Conference reviewed	Heather Leonard
11/20/2021	List of Witnesses to Depose reviewed	Heather Leonard
11/20/2021	Fraud and send discovery responses to Defendant	Heather Leonard
11/20/2021	2 emails sent/reviewed regarding Key v HMMA - pleading comparison (due by 12/1)	Heather Leonard
11/20/2021	2 emails sent/reviewed regarding Documents	Heather Leonard
11/20/2021	1 email sent/reviewed regarding Key v HMMA - pleading comparison (due by 12/1)	Heather Leonard
11/20/2021	Notes for Scheduling Conference reviewed	Heather Leonard
11/19/2021	PL - First RFA, interrogatories, and RPD to Def - Served 2021.11.19 created, then edited	Heather Leonard
11/19/2021	Dynamic - Key - Initial Disclosures [EM 10-12-2021] reviewed	Heather Leonard
11/19/2021	List of Witnesses to Depose created, then edited	Heather Leonard
11/19/2021	Notes for Scheduling Conference created	Heather Leonard
11/19/2021	2 emails sent/reviewed regarding Key Witnesses We May Want to Depose	Heather Leonard
11/19/2021	Doc. 46, REPORT of Rule 261 Planning Meeting reviewed	Heather Leonard
11/19/2021	Doc. 43 - Dynamic Security, Inc.'s Answer and Defenses to Plaintiff's Amended Complaint ANSWER to 28 Amended Complaint reviewed	Heather Leonard
11/19/2021	1 email sent/reviewed regarding Your call	Heather Leonard
11/19/2021	1 email sent/reviewed regarding Attorney Client communication - Key v. Hyundai - Discovery questions followup	Heather Leonard
11/19/2021	2 emails sent/reviewed regarding Your call	Heather Leonard
11/19/2021	1 email sent/reviewed regarding Message For [76657491619131816] 2021-11-09 01:52PM	Heather Leonard
11/19/2021	1 email sent/reviewed regarding Madison position	Heather Leonard
11/19/2021	1 email sent/reviewed regarding Davita M. Key v. Hyundai Motor Manufacturing Alabama, LLC, Hyundai Engineering America, Inc., and Dynamic Security, Inc. - Discovery Requests for You to Answer	Heather Leonard
11/19/2021	Email attachment reviewed - 2021-11-2 Pl. 1st Discovery to HMMA	Heather Leonard
11/19/2021	1 email sent/reviewed regarding Key v. HMMA et al.	Heather Leonard
11/19/2021	1 email sent/reviewed regarding Davita M. Key v. Hyundai Motor Manufacturing Alabama, LLC, Hyundai Engineering America, Inc., and Dynamic Security, Inc. - Discovery Requests for You to Answer	Heather Leonard
11/19/2021	Go through client's file (paper and electronic) to try to answer the discovery requests	Heather Leonard
11/19/2021	3 emails sent/reviewed regarding Form for your review and revision - test draft of discovery to HMMA	Heather Leonard
11/19/2021	Form, No Footer created	Heather Leonard
11/19/2021	Send Client Discovery Requests for Them to Answer	Heather Leonard
11/19/2021	5 emails sent/reviewed regarding Key v. HMMA, et al.	Heather Leonard
11/19/2021	1 email sent/reviewed regarding Davita M. Key v. Hyundai Motor Manufacturing Alabama, LLC, Hyundai Engineering America, Inc., and Dynamic Security, Inc. - Discovery Requests for You to Answer	Heather Leonard
11/19/2021	Def - Re production of insurance agreement - Ford Harrison, LLP created, then edited	Heather Leonard
11/19/2021	1 email sent/reviewed regarding Davita Key v. HMMA, et al.	Heather Leonard
11/19/2021	Client - Re: Defendant's Discovery Requests is to Plaintiff created, then reviewed	Heather Leonard
10/15/2021	1 email sent/reviewed regarding Davita M. Key v. HMMA, et al.	Heather Leonard
10/13/2021	Def - Re production of insurance agreement - Ford Harrison, LLP reviewed	Heather Leonard
10/13/2021	1 email sent/reviewed regarding Davita Key v. HMMA, et al.	Heather Leonard
10/13/2021	Dynamic - Key - Initial Disclosures - 000001 - 000008 created	Heather Leonard
10/13/2021	Def - Re production of insurance agreement - Ford Harrison, LLP created, then edited	Heather Leonard
10/13/2021	Dynamic - Key - Initial Disclosures - 000001 - 000008 - DO NOT USE - Doc. 1 clawn back reviewed	Heather Leonard
10/13/2021	1 email sent/reviewed regarding Key v. HMMA, et al.	Heather Leonard
10/13/2021	3 emails sent/reviewed regarding Davita Key v. Dynamic Security, Inc. - Initial Disclosures and Production	Heather Leonard
10/13/2021	1 email sent/reviewed regarding Davita Key v. HMMA, et al.	Heather Leonard

10/13/2021	2 emails sent/reviewed regarding Key v. HMMA, HEA, and Dynamic - request for a copy of Dynamic's insurance agreement	Heather Leonard	0.1
10/13/2021	Matter admin	Heather Leonard	0.2
10/12/2021	1 email sent/reviewed regarding Key v HMMA et al - Plaintiff Initial Disclosures and Link	Heather Leonard	0.1
10/12/2021	Key Unemployment Docs .000002-000033 created	Heather Leonard	0.1
10/7/2021	2 emails sent/reviewed regarding Draft Rule 26 report in Key v HMMA	Heather Leonard	0.1
9/24/2021	3 emails sent/reviewed regarding 2:19-cv-00767-ECM-SMD Key v HMMA et al - Word Version of Proposed Privacy Protective Order (Doc. 47)	Heather Leonard	0.1
9/23/2021	1 email sent/reviewed regarding 2:19-cv-00767-ECM-SMD Key v HMMA et al - Word Version of Proposed Privacy Protective Order (Doc. 47)	Heather Leonard	0.1
9/23/2021	Joint Motion for Protective Order - To File created, then edited	Heather Leonard	0.2
9/23/2021	Email attachment reviewed - 717472	Heather Leonard	0.3
9/23/2021	Joint Motion for Protective Order - Draft 1 edited	Heather Leonard	0.1
9/23/2021	Proposed Privacy Protective Order - Draft 2 - PL Review of Def Revisions created, then edited and reviewed	Heather Leonard	0.1
9/23/2021	2 emails sent/reviewed regarding Key v HMMA et al - Privacy Protective Order	Heather Leonard	0.1
9/23/2021	8 emails sent/reviewed regarding Draft Rule 26 report in Key v HMMA	Heather Leonard	0.6
9/23/2021	Rev 26 Report - Draft 2 - PL review of Def Proposed Changes created, then edited	Heather Leonard	0.3
9/23/2021	1 email sent/reviewed regarding Automatic reply: Draft Rule 26 report in Key v HMMA	Heather Leonard	0.1
9/21/2021	4 emails sent/reviewed regarding Draft Rule 26 report in Key v HMMA	Heather Leonard	0.2
9/17/2021	1 email sent/reviewed regarding Draft Rule 26 report in Key v HMMA	Heather Leonard	0.1
9/17/2021	Parties Planning Conference - Key v HMMA, et al (https://us02web.zoom.us/j/87182668338?pwd=MmSsMnVYbUdodUZ6QTfQb0YwTUluZr09&from=addon) attended	Heather Leonard	0.5
9/17/2021	Rule 26 Report edited	Heather Leonard	1.3
9/15/2021	1 email sent/reviewed regarding Key v. HMMA, et al. - Rule 26 report and proposed protective order	Heather Leonard	0.1
9/9/2021	5 emails sent/reviewed regarding Key v. HMMA, et al. - Rule 26 report and proposed protective order	Heather Leonard	0.1
9/8/2021	1 email sent/reviewed regarding Key v. HMMA, et al. - Rule 26 report and proposed protective order	Heather Leonard	0.1
9/8/2021	Email attachment reviewed - Rule 26 Report	Heather Leonard	0.1
9/7/2021	1 email sent/reviewed regarding Key v. HMMA, et al. - Rule 26 report and proposed protective order	Heather Leonard	0.1
9/1/2021	Review Doc. 40 - Order on When to Hold Rule 26 Conference	Heather Leonard	0.1
9/1/2021	Joint Motion for Protective Order - Draft 1 created, then edited	Heather Leonard	0.1
9/1/2021	2 emails sent/reviewed regarding Key v. HMMA, et al. - Rule 26 report and proposed protective order	Heather Leonard	0.1
9/1/2021	Privacy Protective Order - Draft 1 created, then edited	Heather Leonard	0.1
8/1/2021	1 email sent/reviewed regarding Key v. HMMA - things for you to bless before I send to the defendants	Heather Leonard	0.1
8/1/2021	1 email sent/reviewed regarding Automatic reply: Key v. HMMA, et al. - Rule 26 report and proposed protective order	Heather Leonard	0.1
8/1/2021	1 email sent/reviewed regarding [NELA-AL] : Middle District Order on MTD - Joint Employers and Dreadloc Hair	Heather Leonard	0.1
9/1/2021	Rule 26 Report created, then edited	Heather Leonard	1.2
9/1/2021	Def 2021.09.01 - Re Rule 26 planning conference created, then edited	Heather Leonard	0.3
9/1/2021	Doc. 39 - Notice of Correction reviewed	Heather Leonard	0.1
9/1/2021	1 email sent/reviewed regarding Natural Hair Discrimination	Heather Leonard	0.1
8/31/2021	Read Doc. 38 - Order and opinion on MTD	Heather Leonard	0.5
6/21/2021	1 email sent/reviewed regarding Beasley	Heather Leonard	0.1
4/5/2021	1 email sent/reviewed regarding How hair discrimination impacts Black Americans in their personal lives and the workplace	Heather Leonard	0.1
11/24/2020	1 email sent/reviewed regarding Key v. Hyundai	Heather Leonard	0.1
7/17/2020 REV	Review - Doc. 37 - HEA MTD Reply	Heather Leonard	0.2
7/8/2020	Doc. 34 - Response to MTDs reviewed	Heather Leonard	0.5
	Email to L. Palmer re: response to MTD		
7/8/2020	1 email sent/reviewed regarding Key v. Hyundai - MTD I	Heather Leonard	0.1
7/8/2020	2 emails sent/reviewed regarding Key v. Hyundai - respc Exchanged emails with L. Palmer re: revisions to and filing of our response	Heather Leonard	0.1
7/8/2020	PL - MTD Response V1 - 2020-07-07 - HNL Review crea Review and revise draft of response prepared by L. Palmer	Heather Leonard	0.6
7/1/2020	1 email sent/reviewed regarding Key v. Hyundai, et al	Heather Leonard	0.1
6/26/2020	2 emails sent/reviewed regarding Case	Heather Leonard	0.1
6/17/2020 REV	Review and Calendar - Doc. 33 - Briefing Order	Heather Leonard	0.1
6/17/2020	Doc. 33 - Briefing Order on MTDs reviewed	Heather Leonard	0.1
6/15/2020	Doc. 32 - MTD by Dynamic reviewed	Heather Leonard	0.3
6/12/2020	1 email sent/reviewed regarding Key v. HMMA, HEA, Dynamic	Heather Leonard	0.1
6/2/2020	5 emails sent/reviewed regarding Key v. HMMA, HEA, Dynamic	Heather Leonard	0.2
6/2/2020	Def - Clarificatoin on Mootness of MTD created, then reviewed	Heather Leonard	0.1
6/2/2020 REV	Review - Doc. 29 - Order Mooting MTDs	Heather Leonard	0.1
6/1/2020	Doc. 23 - Motion to Amend reviewed	Heather Leonard	0.1
6/1/2020	1 email sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Order on Motion to Amend/Correct	Heather Leonard	0.1
6/1/2020	1 email sent/reviewed regarding Key - Amended Complaint	Heather Leonard	0.1
6/1/2020 REV	Review - Doc. 27 - Order Granting Motion to Amend Complaint	Heather Leonard	0.1
5/27/2020	1 email sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Motions No Longer Referred	Heather Leonard	0.1

5/26/2020	2 emails sent/reviewed regarding Natural Hair Discrimination	Heather Leonard	0.1	
5/21/2020	1 email sent/reviewed regarding Natural Hair Discrimination	Heather Leonard	0.1	
5/20/2020	1 email sent/reviewed regarding Key v Hyundai Motor Manufacturing Alabama, LLC, et al. - do defendants oppose Plaintiff amending her complaint?	Heather Leonard	0.1	
5/20/2020	2 emails sent/reviewed regarding Key v Hyundai - motion to amend	Heather Leonard	0.1	
5/20/2020	1 email sent/reviewed regarding Key v. Hyundai	Heather Leonard	0.1	
5/20/2020	3 emails sent/reviewed regarding Discrimination - Nat'l List serv discussion about cases finding discrimination re: dreadlocks	Heather Leonard	0.1	
5/20/2020	Notice of Appearance - Leslie Palmer created, then edited	Heather Leonard	0.1	
5/20/2020	Notice of Appearance created, then edited and reviewed Notice of Appearance for Heather Leonard	Heather Leonard	0.1	
5/20/2020	Amend Complaint - HNL Review created, then edited and Reviewed and made changes to the amended complaint prepared by Leslie	Heather Leonard	0.8	
5/20/2020	LDF-Primer-on-Hair-Discrimination-Resources-FINAL created	Heather Leonard	0.1	
5/20/2020	Motion to Amend Complaint reviewed	Reviewed Leslie's proposed changes; made a few changes myself; emailed it back to her	Heather Leonard	0.2
5/19/2020	Doc. 11 - Hyundai Manufacturing MTD reviewed	Heather Leonard	0.3	
5/19/2020 DRAFT	Draft - PL - Response to Motions to Dismiss	Heather Leonard	2.4	
5/19/2020 DRAFT	Draft - Motion to Amend Complaint	Heather Leonard	0.4	
5/19/2020 COMM	Communicate - sent email to defendants about motion Asking defendants d they opposed the motion	Heather Leonard	0.1	
5/19/2020 REV	Review and revise amended complaint	Initially prepared by Leslie Palmer; I reviewed and made changes	Heather Leonard	0.8
5/19/2020	2 emails sent/reviewed regarding Hairstyle post	Heather Leonard	0.1	
5/19/2020	1 email sent/reviewed regarding Hair discrimination	Heather Leonard	0.1	
5/19/2020	Doc. 13 - Dynamic Security MTD reviewed	Heather Leonard	0.3	
5/19/2020	2 emails sent/reviewed regarding Davita Key v. Hyundai et al	Heather Leonard	0.1	
5/19/2020 COMM	Communicate - Email to Wendy Greene seeking guidance Seeking her advice on how to best present the argument	Heather Leonard	0.1	
5/17/2020	Prepare motion to amend	Heather Leonard	0.1	
5/17/2020	Review Complaint	Heather Leonard	0.3	
5/17/2020	1 email sent/reviewed regarding Agreement for Representation - Signature required	Heather Leonard	0.2	
5/17/2020	Contingency Fee Agreement - 2020 - joint with Leonard and Palmer created	Heather Leonard	0.1	
5/17/2020	Signed Fee Agreement created	Heather Leonard	0.1	
5/17/2020	Davita Key created	Heather Leonard	0.1	
5/17/2020	Doc. 1 - Complaint reviewed	Heather Leonard	0.2	
3/25/2024	Services provided on 3/25/2024	. 1 message sent/reviewed (0.10 hrs)	Christine Poynter	0.1
3/14/2024	Services provided on 3/14/2024	- Stern - DOC 280 - ORDER ON FEES reviewed (0.10 hrs) - Trial Transcript 1 Summary edited and reviewed (2.90 hrs)	Christine Poynter	0.1
8/9/2023	Services provided on 8/9/2023	- Doc. 194 - Trial Transcript VOlume I - March 27, 2023 reviewed (1.00 hrs) - Trial Transcript 1 Summary edited (3.00 hrs)	Christine Poynter	3.9
8/8/2023	Services provided on 8/8/2023	- Doc. 194 - Trial Transcript VOLUME I - March 27, 2023 reviewed (1.50 hrs)	Christine Poynter	4.5
8/7/2023	Services provided on 8/7/2023	- 1 email sent/reviewed regarding Summarize Trial Transcript - 8.8 per HL (0.20 hrs) - Doc. 195 - Trial Transcript Volume II - March 28, 2023 reviewed (0.10 hrs) - Summary Template edited (0.60 hrs) - Doc. 194 - Trial Transcript VOLUME I - March 27, 2023 reviewed (0.70 hrs) - Trial Transcript 1 Summary created, then reviewed (0.40 hrs)	Christine Poynter	0.2
8/5/2023	Services provided on 8/5/2023	- 1 email sent/reviewed regarding Summarize Trial Transcript - 8.8 per HL (0.10 hrs)	Christine Poynter	1.9
		. PL - Motion for Equitable Relief reviewed (0.10 hrs) - Doc. 207 - RESPONSE in Opposition re [193] MOTION for Equitable Relief of Reinstatement of Interest filed by Dynamic Security, Inc.. reviewed (0.10 hrs)		
6/28/2023	Services provided on 6/28/2023	- PL - Response to Del Post Trial Motions V3 reviewed (0.10 hrs) - Doc. 206 - RESPONSE in Opposition re [197] MOTION for Judgment as a Matter of Law Defendant reviewed (0.10 hrs) - Exhibit 2 reviewed (0.10 hrs) - Jefferson v. Sewon Am., Inc reviewed (0.10 hrs) - Doc. 193 - MOTION EQUITABLE RELIEF OF REINSTATEMENT AND INTEREST by Davita M. Key reviewed (0.10 hrs)	Christine Poynter	0.4
6/15/2023	Services provided on 6/15/2023	- Doc. 186 - ORDER AND JUDGMENT After this case had been presented to a jury, a verdict was returned reviewed (0.10 hrs)	Christine Poynter	0.5
6/8/2023	Services provided on 6/8/2023	- 5 emails sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Order (0.10 hrs)	Christine Poynter	8
4/25/2023	Services provided on 4/25/2023	- Mediation of Dynamic Security Claims (Littler Mendelson (Jay St. Clair)) attended (8.00 hrs) - Doc. 193 - MOTION EQUITABLE RELIEF OF REINSTATEMENT AND INTEREST by Davita M. Key reviewed (0.10 hrs)	Christine Poynter	0.1

			- 81-5 Ex 5 Latanya Howell Statement (reviewed (0.10 hrs))
			- Doc. 81-9 - Exhibit 9 - HHMA Safety Handbook (reviewed (0.10 hrs))
			- Riddle Outfitting (reviewed (0.10 hrs))
			- Doc. 138 MEMORANDUM OPINION AND ORDER it is ORDERED (reviewed (0.10 hrs))
			- Memo to HL re Interlocutory Appeal to jury request (reviewed (0.10 hrs))
			- Doc. 174 - Order Denying Interlocutory Appeal (reviewed (0.10 hrs))
			- Def HHMA 2021_10_12 Re defendant's in Rule 26 Disclosures (reviewed (0.10 hrs))
			- Key- Kristal Riddle (depo summary) (reviewed (0.10 hrs))
			- Signed Fee Agreement (reviewed (0.10 hrs))
			- Contingency Fee Agreement - 2020 - joint with Leonard and Palmer (reviewed (0.10 hrs))
			- 1 email sent/reviewed regarding Key v HHMA, et al - HIA Insurance Coverage (0.10 hrs)
3/30/2023	Services provided on 3/30/2023	Christine Poynter	1.1
3/29/2023	Services provided on 3/29/2023	Christine Poynter	0.3
3/27/2023	Services provided on 3/27/2023	Christine Poynter	0.3
3/22/2023 DISCO	Services provided on 3/22/2023 Prepare/review - Christine and Abby put together Exhibit Christine and Abby put together Exhibit Notebooks for trial	Christine Poynter	0.3
3/20/2023	Services provided on 3/20/2023 Zoom Trial Deposition for Gloria Robinson (Zoom) attended (2.00 hrs)	Christine Poynter	0.3
3/19/2023	Services provided on 3/19/2023 - Zoom trial deposition of Nicole Scarella attended (1.00 hrs)	Christine Poynter	0.3
3/8/2023	Services provided on 3/8/2023 - Pr. 37- email 11/13/18 Williams, Spiller and others re Dynamic and HHMA charge (reviewed (0.10 hrs))	Christine Poynter	0.3
	- Px 23- Key (removal from Hyundai discipline report (reviewed (0.10 hrs))	Christine Poynter	0.3
	- Doc. 174 - Order Denying Interlocutory Appeal (reviewed (0.20 hrs))	Christine Poynter	0.2
	- Doc. 163 - Defendant Dynamic Security, Inc.'s Motion to Certify or Interlocutory Appeal and Continue Trial Setting (reviewed (0.10 hrs))	Christine Poynter	0.2
	- Memo to HL re interlocutory appeal to jury request created, then edited (0.20 hrs)	Christine Poynter	0.2
	- Dr. 11- receipt of employment handbook and dynamic security officers handbook (reviewed (0.10 hrs))	Christine Poynter	0.2
	- Doc. 89- Ex 4 - Deposition Excerpts - MOTION to Strike Plaintiff's Demand for Jury Trial by Dynamic Security, Inc., (reviewed (0.10 hrs))	Christine Poynter	0.2
	- 5 internal messages sent/reviewed (0.10 hrs)	Christine Poynter	0.2
	- Doc. 98 - Dynamic Witness List (reviewed (0.10 hrs))	Christine Poynter	0.2
	- Doc. 105 - Exhibit List Defendant Dynamic Security, Inc.'s Amended Exhibit List by Dynamic Security, Inc. (reviewed (0.10 hrs))	Christine Poynter	0.2
	- Doc. 99 - Dynamic Exhibit List (reviewed (0.10 hrs))	Christine Poynter	0.2
	- Defendant Dynamic Security, Inc.'s Witness List (unredacted) - 01-26-2023 (reviewed (0.10 hrs))	Christine Poynter	0.2
	- Comparison of Exhibit Lists (reviewed (0.10 hrs))	Christine Poynter	0.2
	- Doc. 161 - Proposed Jury Instructions by Dynamic Security, Inc... (reviewed (0.10 hrs))	Christine Poynter	0.2
	- Pl. - Jury Charges (filed 2023-02-24) (reviewed (0.10 hrs))	Christine Poynter	0.2
	- Doc. 155 - Defendant's Verdict (reviewed (0.10 hrs))	Christine Poynter	0.2
	- Doc. 154 - Proposed Verdict (filed by Davita M. Key) (reviewed (0.10 hrs))	Christine Poynter	0.2
	- Pl. (Witness List - unredacted reviewed (0.10 hrs))	Christine Poynter	0.2
	- 1 email sent/reviewed regarding Key v Dynamic - trial subpoenas and Rule 408 settlement discussions [WV09-WSACTNLLPFD1997338] (0.10 hrs)	Christine Poynter	0.2
3/6/2023	Services provided on 3/6/2023 Review -	Christine Poynter	0.2
3/1/2023 REV	Services provided on 3/1/2023 Services provided on 2/24/2023	Christine Poynter	0.1
2/24/2023	Services provided on 2/24/2023 Services provided on 2/22/2023	Christine Poynter	0.1
2/22/2023	Services provided on 2/22/2023 Services provided on 2/17/2023	Christine Poynter	0.1
2/17/2023	Services provided on 2/13/2023 Services provided on 2/13/2023	Christine Poynter	0.1

			- Doc. Index and Quarterly Damages Calc edited (0.10 hrs)
			- Key- Dynamic Security Index reviewed (0.10 hrs)
			- 8044773 Key, Davita H. 06/2022 full reviewed (0.20 hrs)
			- IMG-2485 reviewed (0.10 hrs)
			- Depo Notes - Dynamic - Crystal Riddle(3Qb)(6) reviewed (0.20 hrs)
			- HEARPRO .003 export reviewed (0.20 hrs)
			- Exhibit 11 reviewed (0.10 hrs)
			- Exhibit 21 reviewed (0.10 hrs)
			- Key- Dynamic Security Index reviewed (0.20 hrs)
			- 2022-08-05 Declaration - Nicole Scarella reviewed (0.20 hrs)
			- Review and pull documents for Ray Cullenon Deposition (2.00 hrs)
			- 1 internal message sent/reviewed (0.10 hrs)
			- Deposition of Dynamic 3Qb(l)(6)(Palmer Law) attended (7.50 hrs)
			- Deposition of Davita Key (700 Hyundai Blvd (700 Hyundai Blvd, Montgomery, Alabama 36105)) attended (8.00 hrs)
			- 1 email sent/reviewed regarding Activity in Case (0.10 hrs)
			- 1 email sent/reviewed regarding Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alabama, LLC et al Order (0.10 hrs)
			- DRAFT Answer to Dynamic's interrogatories edited (0.80 hrs)
			- Go through client's file (paper and electronic on Smoketab) to try to answer the discovery requests (2.00 hrs)
			- PL - First RFA, Interrogatories, and RPD to HEA. Served 2021.12.13 reviewed (0.10 hrs)
			- Davita Key HMMR HEA and Dynamic- HEA's First Discovery Requests to Plaintiff 4871-4300-8527 v.1 reviewed (0.10 hrs)
			- DRAFT PLAINTIFF'S ANSWERS TO INTERROGATORIES AND RFP (1) reviewed (0.10 hrs)
			- DRAFT Answer to Dynamic's interrogatories reviewed (0.10 hrs)
			- DRAFT ANSWERS TO INTERROGATORIES reviewed (0.10 hrs)
			- Dynamic Security, Inc.- Davita Key - Dynamic Security, Inc.'s First Requests for Production of Documents and Things to Plaintiff [EM-03-11-2022] reviewed (0.10 hrs)
			- DRAFT RESPONSES TO DYNAMIC'S REQUEST FOR ADMISSIONS created (0.10 hrs)
			- DRAFT RESPONSES TO DYNAMIC'S REQUEST FOR ADMISSIONS created (0.10 hrs)
			- PL RFP Resp HMMR reviewed (0.10 hrs)
			- 3 emails sent/reviewed regarding Davita Key- Discovery requests (0.10 hrs)
			- 2 emails sent/reviewed regarding Davita Key v. Hyundai- DRAFT ANSWERS (word doc) TO DYNAMIC'S DISCOVERY REQUEST (0.10 hrs)
			- Type in Defendant's Discovery Requests for (0.70 hrs)
			- DRAFT PLAINTIFF'S ANSWERS TO INTERROGATORIES AND RFP (1) reviewed (0.10 hrs)
			- DRAFT Answer to Dynamic's Interrogatories created, then edited (0.40 hrs)
			- DRAFT ANSWERS TO INTERROGATORIES reviewed (0.20 hrs)
			- Dynamic Security, Inc.- Davita Key - Dynamic Security, Inc.'s First Interrogatories to Plaintiff [EM-03-11-2022] reviewed (0.10 hrs)
			- Dynamic Security, Inc.- Davita Key - Dynamic Security, Inc.'s First Interrogatories to Plaintiff [EM-03-11-2022] reviewed (0.10 hrs)
			- Client- Re Defendant's Discovery Requests to Plaintiff created (0.40 hrs)
			- 3 emails sent/reviewed regarding Davita Key v. Hyundai Motor Manufacturing Alabama (0.20 hrs)
			- DRAFT PLAINTIFF'S ANSWERS TO INTERROGATORIES AND RFP (1) reviewed (0.20 hrs)
			- Quarterly Backpay Calculations reviewed (0.20 hrs)
			- PL - First RFA, Interrogatories, and RPD to HEA. Served 2021.12.13 reviewed (0.10 hrs)
			- Key 000383-000385 reviewed (0.10 hrs)
			- Doc. 54 - NOTICE of Appearance by Thomas Matthew Miller on behalf of Hyundai Engineering America, Inc. (Miller, Thomas) reviewed (0.10 hrs)
			- DMK/HY Interrogatories Answers reviewed (0.10 hrs)
			- PL - First RFA, Interrogatories, and RPD to HEA. Served 2021.12.13 reviewed (0.10 hrs)
			- DRAFT PLAINTIFF'S ANSWERS TO INTERROGATORIES AND RFP (1) created, then reviewed (0.40 hrs)
			- EEOC - CMS_ Final reviewed (0.10 hrs)
			- 1 email sent/reviewed regarding Davita Key's Draft Answers to discovery requests from HEA (0.10 hrs)
			- 1 email sent/reviewed regarding Case (0.10 hrs)
			- Go through client's file (paper and electronic on Smoketab) to try to answer the discovery requests (2.00 hrs)
			- 1 internal message sent/reviewed (0.10 hrs)
			- DRAFT ANSWERS TO INTERROGATORIES reviewed (0.10 hrs)
			- Type in HEA discovery responses for our answers and email to client and Leslie (0.60 hrs)
			- 1 email sent/reviewed regarding Document shared with you: DRAFT PLAINTIFF'S ANSWERS TO INTERROGATORIES AND RFP (0.10 hrs)
3/1/2022	Services provided on 3/1/2022	Christine Poynter	3.6
3/1/2022	Services provided on 2/23/2022	Christine Poynter	0.7
3/1/2022	Services provided on 2/18/2022	Christine Poynter	0.1

2/17/2022	Services provided on 2/17/2022	<ul style="list-style-type: none"> - Doc. 47 - Joint Motion for Entry of Protective Order reviewed (0.10 hrs) - Doc. 39 - Notice of Correction reviewed (0.10 hrs) - Doc. 28 - Amended Complaint reviewed (0.10 hrs) - DRAFT PLAINTIFF'S ANSWERS TO INTERROGATORIES AND RFP created, then edited and reviewed (0.80 hrs) - Doc. 1 - Complaint reviewed (0.10 hrs) - 6 emails sent/reviewed regarding Davila Key v HMMA HEA and Dynamic - HEA's First Discovery Requests to Plaintiff 4871-4300-8527 v.1.pdf (0.20 hrs) - 1 email sent/reviewed regarding Responses (0.10 hrs) - 2 emails sent/reviewed regarding Key v. Hyundai - DRAFT PLAINTIFF'S ANSWERS TO DISCOVERY (0.10 hrs) - Deposition Notice - Chambliss edited (0.10 hrs) - Deposition Notice - Gloria Robinson edited (0.10 hrs) - Deposition Notice - Howell edited (0.10 hrs) - Deposition Notice - Ray Cureton edited (0.20 hrs) - Deposition Notice - Scavetta edited (0.10 hrs) - HEA Initial Disclosures 211012 reviewed (0.10 hrs) - Deposition Notice - Key, Davita created (0.10 hrs) - Deposition Notice - Williams, Cassandra created (0.10 hrs) - Deposition Notice - ROBERT BURNS created (0.10 hrs) - 30(b)(6) Deposition Notice - HMMA.docx reviewed (0.30 hrs) 	Christine Poynter
2/15/2022	Services provided on 2/15/2022	<ul style="list-style-type: none"> - Prepare deposition notices for all persons on the defendants' initial disclosures (1.00 hrs) - Deposition Notice - Chambliss created (0.10 hrs) - Deposition Notice - Gloria Robinson created, then reviewed (0.10 hrs) - Deposition Notice - Scavetta created (0.10 hrs) - Deposition Notice - Ray Cureton created (0.10 hrs) - Deposition Notice - Ray Cureton created (0.10 hrs) - Deposition Notice - Howell created (0.20 hrs) - Dynamic - Key - Initial Disclosures [EM 10-12-2021] reviewed (0.10 hrs) - 30(b)(6) Deposition Notice LP Edits reviewed (0.10 hrs) - HEA Initial Disclosures 211012 reviewed (0.10 hrs) 	Christine Poynter
2/10/2022	Services provided on 2/10/2022	<ul style="list-style-type: none"> - HMMA's Rule 26 Mandatory Disclosures reviewed (0.10 hrs) - 1 email sent/reviewed regarding Davila M. Key v. Hyundai Motor Manufacturing Alabama, LLC, Hyundai Engineering America, Inc., and Dynamic Security, Inc. - Discovery Requests for You to Answer (0.10 hrs) 	Christine Poynter
11/8/2021	Services provided on 11/8/2021	<ul style="list-style-type: none"> - 1 email sent/reviewed regarding Key v. Hyundai - Discovery Requests (0.10 hrs) - Doc. 47 - Joint Motion for Entry of Protective Order reviewed (0.10 hrs) - DRAFT RESPONSES TO REQUEST FOR PRODUCTION created (0.10 hrs) - DRAFT RESPONSES TO RFP reviewed (0.70 hrs) - Discovery requests - Interrogatories reviewed (0.20 hrs) - HMMA's INT reviewed (0.10 hrs) - DRAFT ANSWERS TO INTERROGATORIES created, then edited (0.40 hrs) 	Christine Poynter
11/4/2021	Services provided on 11/4/2021	<ul style="list-style-type: none"> - Type in Defendant's Discovery Requests for (0.70 hrs) - HMMA's INT reviewed (0.10 hrs) - Discovery requests - Interrogatories created, then edited (1.10 hrs) - DRAFT RESPONSES TO RFP created, then edited (0.10 hrs) - HMMA's RFP reviewed (0.10 hrs) - 3 emails sent/reviewed regarding Davila M. Key v. Hyundai Motor Manufacturing Alabama, LLC, Hyundai Engineering America, Inc., and Dynamic Security, Inc. - Discovery Requests for You to Answer (0.10 hrs) 	Christine Poynter
11/3/2021	Services provided on 11/3/2021		Christine Poynter
10/18/2021	Services provided on 10/18/2021	<ul style="list-style-type: none"> - Doc. 47 - Joint Motion for Entry of Protective Order created (0.10 hrs) - Email attachment reviewed - Dynamic - Key - Initial Disclosures - 000001 - 000037 (0.20 hrs) - 1 email sent/reviewed regarding Davila Key v. Dynamic Security, Inc. - Initial Disclosures and Production (0.10 hrs) 	Christine Poynter
10/13/2021	Services provided on 10/13/2021	<ul style="list-style-type: none"> - Input HMMA's witnesses into the Smokeball witness chart (0.10 hrs) 	Christine Poynter
Total - Billable			0.4
Total - Non-Billable			401.8
Total - Write Off			57.7
			0

Expense entries

Date	Activity	Description	Staff	Quantity	Price
3/18/2024	COPY	Billable Copies - Doc. 213 - Memorandum Opinion	Heather Leonard	8	\$0.25
3/11/2024	COPY	Billable Copies - Doc. 212 - Order on post-trial motion	Heather Leonard	10	\$0.25